

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TERRAFORM LABS PTE LTD. and  
DO HYEONG KWON,

Defendants.

No. 1:23-cv-1346 (JSR)

**AMENDED JOINT PRETRIAL CONSENT ORDER**

Pursuant to Rule 4 of the Court's Individual Rules of Practice, Plaintiff Securities and Exchange Commission (the "SEC") and Defendants, Terraform Labs PTE Ltd. ("Terraform") and Do Hyeong Kwon ("Kwon") submit this proposed joint pretrial order for the jury trial scheduled to commence on March 25, 2024.

**I. JOINT OVERVIEW OF THE CASE**

This is a securities fraud case,<sup>1</sup> brought under Section 17(a) of the Securities Act [15 U.S.C. § 78q], Section 10(b) of the Exchange Act [15 U.S.C. § 78(b)], and Exchange Act Rule 10b-5 [17 C.F.R. § 240.10b-5]. The SEC alleges that Defendants engaged in two schemes to defraud investors through materially false and misleading statements and other deceptive conduct. Defendants' first scheme was to deceive investors about the stability of a crypto asset security that Defendants created called Terra USD ("UST"). Although Defendants touted that

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<sup>1</sup> The Court granted summary judgment in the SEC's favor on its Securities Act Section 5(a) and (c) claims [15 U.S.C §§ 77e(a), 77e(c)]. *SEC v. Terraform Labs Pte. Ltd.*, 2023 WL 8944860, at \*16 (S.D.N.Y. Dec. 28, 2023).

UST's value was "pegged" at \$1.00 through a Terraform blockchain algorithm, UST's price fell in May 2021 to \$0.91. The SEC alleges that Defendants secretly arranged for a third party, Jump Trading LLC ("Jump"), to make bulk purchases of UST to bolster the price back up to \$1.00. Defendants also made allegedly false and misleading statements regarding the stability of UST, including by stating that UST "automatically" recovered its \$1.00 price in May 2021 through the Defendants' protocol, not the "cumbersome nature of stress-induced decision-making of human agents," misleadingly omitting from its statements Defendants' secret deal with Jump to bolster UST's \$1.00 peg.

Defendants' second alleged fraudulent scheme was to deceive investors into believing that a popular Korean payment application called "Chai" used the Terraform blockchain to process and settle payments. According to the SEC, Chai processed and settled its payment transactions in fiat currency using traditional payment means, *ie.*, the Korean Won. The SEC alleges that Defendants deceptively copied actual Chai transactions onto the Terraform blockchain to make it appear that commercial transactions between Korean consumers and retail establishments were using the Terraform blockchain. The SEC further alleges that Defendants also made materially false and misleading statements regarding Chai's supposed use of the Terraform blockchain when offering and selling Defendants' crypto asset securities, including LUNA, to investors.

Defendants deny that they engaged in any fraudulent conduct at all and contend that their statements concerning the stability of UST and/or Chai's use of the Terra blockchain were true and were not materially false or misleading.

Defendants assert that they made no misstatements about the cause of the May 2021 repeg. Defendants further assert that they disclosed (and it was widely known through other

public sources as well) the risks of a depeg and the possibility that open market intervention might be needed to help maintain UST's \$1.00 peg through, for example, the establishment of a stability reserve and the creation of the Luna Foundation Guard.

Defendants assert that there was no secret agreement with Jump to make bulk purchases of UST to bolster the price back up to \$1.00. They instead assert that Jump had been providing liquidity for Terra assets for a long period of time and that this was publicly known. The Defendants also assert that all of Jump's trading decisions regarding purchases of UST were made solely by Jump and there was no agreement between Defendants and Jump that Jump was to make bulk purchases of UST to restore UST's \$1.00 peg. Finally, the Defendants assert that the trading data shows that Jump's trading of UST was not the cause of UST's price returning to a dollar, but instead that the price of UST recovered independently of Jump's trading.

Defendants assert that a number of payment applications, including a popular Korean payment application called "Chai," were designed to use and did use the Terraform blockchain to process and settle payments, that the blockchain transactions associated with Chai are actual transactions directly executed by the commands users entered into their Chai payment apps on their mobile phones, and that these transactions generated significant fees on the blockchain and were part of Chai's revenue.

## **II. PARTICULARIZED DESCRIPTION OF EACH PARTY'S REMAINING CLAIMS, COUNTERCLAIMS, CROSS-CLAIMS, OR THIRD-PARTY CLAIMS**

The SEC's remaining claims are that Defendants violated the antifraud provisions of the federal securities laws by (1) making materially false and misleading statements; and (2) engaging in a scheme to defraud investors regarding the purported stability and use of Terraform's crypto asset securities. Specifically, the SEC alleges Defendants violated Securities Act Section 17(a), which makes it "unlawful for any person in the offer or sale of any securities .

. . by the use of any means or instruments of transportation or communication in interstate commerce . . . (1) to employ any device, scheme, or artifice to defraud; or (2) to obtain money or property by means of any untrue statement of a material fact or any omission to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; or (3) to engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser.” 15 U.S.C. § 77q(a).

The SEC also claims that Defendants violated Exchange Act Section 10(b), which makes it unlawful “[t]o use or employ, in connection with the purchase or sale of any security[,] . . . any manipulative or deceptive device or contrivance in contravention of such rules and regulations as the [SEC] may prescribe.” 15 U.S.C. § 78j(b). The SEC further alleges that Defendants violated Rule 10b-5b (a regulation prescribed under Section 10(b)), which makes it “unlawful for any person, directly, or indirectly, by the use of any means or instrumentality of interstate commerce . . . (a) To employ any device, scheme, or artifice to defraud, (b) To make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, or (c) To engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person, in connection with the purchase or sale of any security.” 17 C.F.R. § 240.10b-5.

Finally, the SEC also alleges that Kwon is liable for the Terraform’s violations of Exchange Act Section 10(b) Act and Rule 10b-5 as a control person of Terraform under

Exchange Act Section 20(a) [15 U.S.C. § 78t(a)].<sup>2</sup> The factual basis for these claims is set forth in the below Fact Stipulations and the SEC's Statement on Disputed Facts.

Defendants have no claims or counterclaims.

**III. PARTICULARIZED STATEMENT OF THE SPECIFIC FACTS, STIPULATIONS, ADMISSIONS, AND OTHER MATTERS ON WHICH THE PARTIES AGREE**

**Exhibit Stipulations**

A. The parties waive all objections to the admissibility of documents identified in each party's Rule 26(a)(3) disclosures on the ground that they are duplicates under Federal Rule of Evidence ("FRE") 1002 (originals) and 1003 (admissibility of duplicates), except to the extent that the version of a document produced at trial varies materially from the original.

B. The parties hereby stipulate that the following exhibits are true and correct copies and are admissible at trial.

PX #	Description	Bates
29	Email docusign obo Goldich to Revsin OTC TSA agreement sign	RCAP.MAY.16.22.10742 to 44
32	Token sale Agreement RCapital Terranova	RCAP.APR.22.22.00011 to 38
57	Terra (@terra_money) 29 long Tweet thread	None
59	Transcript posted on the terraspace.org website titled "The Ship Show Ep 1 Kanav Kariya and Do Kwon Talk DeFi."	None
60	Loan Confirmation up to \$65mm Terraform Labs	SEC-JUMPTRADE-E- 0000074-79
61	Email CJ Han to Vlad Kaganovsky	SEC-JUMPTRADE-E- 0002701-02
64	Email CJ Han to Kanav Kariya	SEC-JUMPTRADE-E-0001390

<sup>2</sup> The Court has already found that "[t]here is no genuine dispute, however, that Kwon is a control person of Terraform under the relevant standard, and the jury will be so instructed." *Terraform Labs*, 2023 WL 8944860, at \*23 (citing *Carpenters Pension Tr. Fund v. Barclays PLC*, 750 F.3d 227, 236 (2d Cir. 2014)).

65b	Email from Tak Fujishima to John Nagel, Kwon, Kariya re: Loan amendment Attachment: Please Docusign Luna Amendment	SEC-JUMPTRADE-E-0001749-53
66	Email CJ Han to Kanav Kariya	SEC-JUMPTRADE-E-0001394
69b	email sent on behalf of John Nagel to Crypto LegalDocs and others	JUMP0085525-26
75	Do Kwon (@stablekwon) tweet -	None
87	Medium.com Post "June 2019 Terra Community Update"	None
88	Medium.com post "July 2019 Terra Community Update"	None
90	Medium.com post October 2018 Terra community update	
91	Email from Kwon to Terra Investor Relations re: Terra Investor Update (October)	AXRP0011339-43
92	Do Kwon Tweet (@stablekwon)	None
93a	screen capture of a post by Do Kwon on the Terra Classic Discord server	None
97	Medium.com post "Monthly Community Update September 2020" author Sarah Kim	None
102b	copy of a video of an October 14, 2019 presentation by Do Kwon on CNBC Africa titled "Korea Runs on Terra"	None
115	Screencapture of terraform website	SEC-HO-14164-E-0000089
116	Screencapture of Chaiscan website	SEC-HO-14164-E-0000148
118b	Screenshot of Kwon interview article	SEC-HO-14164-E-0000084
137	Medium.com post "Terra partners with mobile payment app CHAI to service the growing eCommerce market"	None
138a	Yanloja Agreement with Chai - ECF 125-19	TFL_SEC_00244681-689
138b	Translation of Yanloja Agreement with Chai - ECF 125-19	Translation of TFL SEC 00244681-689
146a	Email from Quip to CJ Han	TFL_SEC_00196954
148a	conversation titled "dev-core"	TFL_SEC_00237912-15
150a	email from Do Kwon to Terra Team	TFL_SEC_00197784-85
160	tweet from @terra_money re: 3/ Track CHAI stats on chaiscan	None
226	LFG Tweet	None
227	Email re: Do Kwon employee chart	TFL_SEC_00159407
231	Whitepaper "Terra Money: Stability and Adoption"	TFL_SEC_00300930

261	Jump Amendment	SEC-Jumptrade-E-0000002-3
276	Medium.com post "November 2020 Community Update" author Sarah Kim	None
282	mail Do Kwon to Terra Investor Relations	AXRP0011544
294	discord chat Wintee and dokwon	N/A
295	discord chat dokwon terra update	N/A
296	commit history LP Server Git Repository - master gitlog	SEC-GITHUB-E-0000300
302	discord chat - dokwon "transactions from Chai..."	N/A
312	LP servicer transaction and message counts	N/A
314	ChaiScan	SEC-KFSC-E-0000377
315	Chai Merchant addresses spreadsheet	N/A
350	Medium.com post "September 2019 Terra Community Update"	None
352	Medium.com post "December 2020 Community Update"	None
521	Deed of Gift between Terraform BVI and LFG	TFL_SEC_00270612-16
543	Medium.com post "Announcing TerraUSD (UST)— the Interchain Stablecoin"	None
544	spreadsheet reflecting TFL and LFG wallet addresses produced by defendants	TFL_SEC_00237821

DX#	Description	Bates
D-0007	Evan Kereiakes et al., Terra Money: Stability and Adoption	ECF 102-5
D-0009	Terra partners with mobile payment app CHAI to service the growing eCommerce market, Medium. <a href="https://medium.com/terra-money/terra-partners-with-mobile-payment-app-chai-29c593f0a364">https://medium.com/terra-money/terra-partners-with-mobile-payment-app-chai-29c593f0a364</a>	None
D-0017	Anchor Whitepaper, <i>Anchor: Gold Standard for Passive Income on the Blockchain</i> , by Nicholas Platias, Eui Joon Lee, and Marco Di Maggio	TFL_SEC_00249235
D-0317	Investment Agreement between Chai/TFL and Certified English translation	None
D-0318	TFL-Chai Investment Agreement	TFL_SEC_00269628-33



D-0319	Yanolja-Chai-TFL Promotion and Support Agreement, English Translation and Original Korean Version	None
D-0320	Yanolja-Chai-TFL Service Agreement, English Translation and Original Korean Version	None
D-0321	Master Digital Currency Loan Agreement between Tai Mo Shan Limited and Terraform Labs PTE LTD	TFL_SEC_00221130-37
D-0328	Master Loan Agreement	SEC-JUMPTRADE-E-0000039-54
D-0329	TFL Pte. Ltd. Directors' Resolution	TFL_SEC_00270260
D-0330	Loan Confirmation	SEC-JUMPTRADE-E-0000074-79
D-0333	Tai Mo Shan OTC Trading Agreement	TFL_SEC_00219392-98
D-0336	Amended and Restated Loan Confirmation	SEC-JUMPTRADE-E-0001749-53
D-0337	Terra Finder Topup Transfer Transaction Details	ECF 125-62
D-0338	Luna Token Sale Agreement	TFL_SEC_A_00107811-39
D-0340	Second Amended and Restated Loan Agreement (Ex. 271)	JUMP0085523-26
D-0341	Second Amended and Restated Loan Confirmation	JUMP0085525-26
D-0354	Token Sale Agreement between LFG and TLL BVI	TFL_SEC_00152998-3025
D-0381	Sygnum Bank AG statement of Do Hyeong Kwon	ECF 125-8
D-0384	Accounting and Corporate Regulatory Authority (ACRA) Business Profile of Terraform Labs Pte. Ltd. (201813807M)	ECF 102-1
D-0385	Data produced by Dr. Matthew J. Edman in support of his Corrected Expert Report, September 19, 2023	None
D-0386	Exhibit 75 to Corrected Expert Report of Dr. Matthew J. Edman	ECF 125-31
D-0387	SEC's Responses and Objections to Defendants' Requests for Admission	ECF 102-70



D-0396	columbus-1-data.tar.lz4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-1-data.tar.lz4">https://d12.quicksync.io/columbus-1-data.tar.lz4</a>	None
D-0397	columbus-2-data.tar.lz4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-2-data.tar.lz4">https://d12.quicksync.io/columbus-2-data.tar.lz4</a>	None
D-0398	columbus-3-archive.20201003.1750.tar.lz4, QuickSync.io, <a href="http://d12.quicksync.io/columbus-3-archive.20201003.1750.tar.lz4">http://d12.quicksync.io/columbus-3-archive.20201003.1750.tar.lz4</a>	None
D-0399	columbus-5-archive.20220830.1141.tar.lz4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-5-archive.20220830.1141.tar.lz4">https://d12.quicksync.io/columbus-5-archive.20220830.1141.tar.lz4</a>	None
D-0400	GitHub terra-money-lp-server.bundle file	SEC-GITHUB-E-0000300
D-0401	GitHub terra-money-lp-watcher.bundle file	SEC-GITHUB-E-0000301
D-0402	GitHub terra-money-topup.bundle file	SEC-GITHUB-E-0000384
D-0404	List of Chai Merchant Wallets	ECF 125-75
D-0406	Columbus-4-archive.20211012.0622.tar.lz4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-4-archive.20211012.0622.tar.lz4">https://d12.quicksync.io/columbus-4-archive.20211012.0622.tar.lz4</a>	None
D-0407	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/terra1e82da9n6jz4t42eh0wn5hrt6hdmf7jyq8sufkp">terra1e82da9n6jz4t42eh0wn5hrt6hdmf7jyq8sufkp</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None

D-0408	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1wqwfw797tf77e2xpvy9xx082pwpxxlm9x4xws, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0409	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1fex9f78reuwhfsnc8sun6mz8rl9zwqh03fhwf3, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0416	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra14l46jrdgdhaw4cejukx50ndp0hss95ekt2kfmw, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None

D-0417	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1dvghtnsqr6eusxxhqcmuhwmpw26rze8kgap823, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0418	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1luagdjr9c9yvp3ak4d7chjm5gldcmgl5rku5, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0419	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1ncjg4a59x2pgvqy9qjyqprlj8lrwshm0wleht5, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0420	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1rvxcszyfecrt2v3a7md8p30hvu39kj6xf48w9e, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None

D-0421	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1x04xgtw1w72gtfzrq7nfwmr6eexla8ecljw28z, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0422	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1ywzl73n563gpdeh7dnqx79j3v9hhlj2fayct8e, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-0426	ChaiScan	SEC-KFSC-E-0000377
D-0427	Cover sheet for video of Signal messages between D. Kwon and President of U.S. Trading Firm	JUMP0024348
D-0428	CV of Dr. Matthew J. Edman	ECF 102-84
D-0999	Merchant wallets document	TFL_SEC_00182107-08
D-1015 (A)	Email from Quip to CJ Han re LP-server sophistication - Korean	TFL_SEC_00196954
D-1016	10/9/2020 Slack conversation between Etienne Napoleone and Paul Kim	TFL_SEC_00214227-29
D-1034	Exhibit 8 from Deposition(s) of Marina Gurevich / Evgeny Gaevoy - Wintermute LUNA Liquidity Consulting and Loan Agreement	TFL_SEC_00215947-58
D-1036	Loan Confirmation	TFL_SEC_00165249-54
D-1037	Amended and Restated Loan Agreement	TFL_SEC_00184232-36
D-1038	Master Loan Agreement	TFL_SEC_00219471-86
D-1039	README.md file for terra-money-lp-server	None

D-1040	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1dp0taj85ruc299rkdvpz4z5pfg6z6swaed74e6, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-1041	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address terra1na2r5d5ele6hh2fz44avgzw5cxvem2j0aaz0nk, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	None
D-1042	Chai Corporation Inc. registration document	None
D-1209	Sentry alert email for LP Server	TFL_SEC_00248420
D-1211	Email from jihoonkim to chai-finance/settlement-worker, et al. with Official Korean to English Translation and Certification	TFL_SEC_00223963-64
D-1212	Email from wool90 to chai-finance/settlement-worker, et al. with Official Korean to English Translation and Certification	TFL_SEC_00223960
D-1215	GitHub email with Chai API Code	TFL_SEC_00223877
D-1216	E-mail from D. Kwan to Terra Investor Relations	TFL_SEC_00223637
D-1220	E-mail from CJ Han to President	SEC-JUMPTRADE-E-0001657-58
D-1224	E-mail from CJ Han to President	SEC-JUMPTRADE-E-0002701-02
D-1226	E-mail from CJ Han to President	SEC-JUMPTRADE-E-0001390

D-1229	E-mail from CJ Han to President	SEC-JUMPTRADE-E-0001394
D-1244	Email from jinyeonseol@yanolja.com to woonam.jung@chai.finance, et al., with Official Korean to English Translation and Certification	TFL_SEC_00244252; ECF 125-30
D-1245	Email from Arjun Sethy to Boris Revsin re [Confidential] Terra Forex Reserve Raise	TRIB00001701-15
D-1424	Terra topup transaction history from blockchain (Exhibit 32 to Dr. Edman Rebuttal Report)	None
D-1435	Jump Trade Data produced by Katten to the SEC on September 2, 2022	SEC-JUMPTRADE-E-0022379-414
D-1437	LP Server Transaction & Message Counts.xlsx	None
D-1438	SEC-GITHUB-E-0000300_collect-merchant-wallets.ts.txt	None
D-1439	SEC-GITHUB-E-0000300_collect-user-wallets.ts.txt	None
D-1504	Transcript of an episode of podcast The Ship Show	None
D-1509	Ex. 269A (Screenshot of the video taken of a conversation between Do Kwon and Kanav Kariya)	None
D-1510	Ex. 269B (Video taken of a conversation between Do Kwon and Kanav Kariya).	None
D-1600 (A)	12/11/2019 dev-core Slack conversation with Paul Kim, DH Yu, Yun Yeo, Do Kwon, et al. (Original Korean)	TFL_SEC_00237912-15
D-1600 (B)	12/11/2019 dev-core Slack conversation with Paul Kim, DH Yu, Yun Yeo, Do Kwon, et al. (English Translation)	TFL_SEC_00237912-15
D-1612	Slack messages between Aaron Myung and Bring Jung	None
D-1627	Kakao chat between Do Kwon and Aaron Myung, between 1-18-21 and 3-21-22	ZFZ_0003381
D-1701	Twitter Contest Tweet thread between Do Kwon and Twitter User	None
D-1704	TFL's port-mortem tweet on depeg	None
D-1711	Public announcement of fundraising by LFG. <a href="https://twitter.com/terra_money/status/1496162889085902856">https://twitter.com/terra_money/status/1496162889085902856</a>	None
D-1742	Conversation between Paul Kim and Etienne Napoleone	None

D-1743 (A)	Conversation between Paul Kim and Yun Yeo (Original Korean)	None
D-1743 (B)	Conversation between Paul Kim and Yun Yeo (Certified English Translation)	None
D-1744	Conversation between Paul Kim and Nicolas Andreoulis	None
D-1745	Conversation between Paul Kim and Michael Brown	None

### **Fact Stipulations**

The parties hereby stipulate and agree to the following facts. The parties reserve the right to object to the admission of any of the following agreed-upon facts on relevance or other grounds.

1. Defendant Kwon Do Hyeong, along with an individual named Daniel Hyun-Seong Shin, founded Terraform Labs Pte. Ltd. ("Terraform") in April 2018.
2. Terraform is a Singaporean software-development firm.
3. Terraform Labs Ltd. ("Terraform BVI") was a 100% wholly owned subsidiary of Terraform.
4. In April 2019, Terraform launched the Terraform blockchain.
5. Since the inception of LUNA, Terraform owned hundreds of millions of LUNA tokens.
6. The UST/LUNA mint-burn algorithm was intended to provide an arbitrage opportunity for traders in UST and LUNA to help keep the price of UST pegged at \$1.00.
7. By May 1, 2022, LUNA had a market value of more than \$27 billion.
8. On May 4, 2022, UST had a market value of approximately \$18.5 billion, of which approximately \$14 billion was on deposit in the Anchor Protocol.
9. By mid-May 2022, the sum of the market capitalizations of LUNA and UST was more than \$40 billion.



10. By late May 2022, the price of LUNA fell to under \$0.01.
11. Defendants directed the movement of funds and/or assets from Luna Foundation Guard (“LFG”) wallet addresses and accounts that held LFG funds and/or assets.
12. Terraform created, maintained, and operated Twitter accounts under the usernames “@terra\_money,” “@lfg\_org,” and “@anchor\_protocol.”
13. In early 2020, Mr. Kwon and Daniel Shin decided to separate the business of Chai from the business of Terraform. Korean regulations were a factor in this decision.
14. From on or about September 10, 2019 through, on or about, May 18, 2022, Mr. Kwon sat on Chai’s Board of Directors.
15. Terraform employees were involved in managing the LP Server.
16. On May 23, 2021, Mr. Kwon communicated with Kanav Kariya, a Jump executive, about the depeg.
17. UST prices were reported in coin pairs such as USTUSDT and USTUSD (as well as in pairs with other fiat currencies and crypto tokens), and LUNA prices were reported in coin pairs such as LUNAUSDT and LUNAUSD (as well as in pairs with other fiat currencies and crypto tokens) on centralized exchanges that listed UST and LUNA (e.g., KuCoin) and were also reported accurately by third-party entities Coinmarketcap, Kaiko, and Coingecko.

**IV. EACH PARTY’S PARTICULARIZED CONTENTIONS AS TO THE SPECIFIC FACTS THAT ARE DISPUTED**

**A. Plaintiff’s Contentions as to Disputed Facts**

**JUMP FRAUD SCHEME**

The following are the SEC’s contentions as to the disputed facts in this case regarding the Defendants’ Jump fraud scheme:

- (1) Defendants secretly arranged for Jump to make bulk purchases of UST to drive the price back up to \$1.00 in May 2021;
- (2) Defendants acted with scienter or negligently when they secretly arranged for Jump to make bulk purchase of UST to drive the price back up to \$1.00;
- (3) Defendants made numerous false and misleading suggesting that the Terraform protocol, or algorithm, caused UST's peg to recover and misleadingly did not disclose the secret arrangement with Jump to intervene to drive UST's price back up to \$1.00.
- (4) Specifically, Defendants made one or more the following false and misleading statements with scienter or negligently regarding the purported stability of UST and to conceal Jump's intervention:
  - a. On May 23, 2021, Kwon issued a twitter thread (SEC Trial Exhibit 56), including his (a) statements that "nobody . . . could believe" that "UST[']s growth [is] manipulated by Terraform Labs," (b) statements purporting to explain how "the protocol(s) have responded" to UST's drop in price, and (c) statements that "none of [the] fundamentals in this ecosystem have changed" because "the ecosystem is significant de-risked for having survived one of the worst market crashes in crypto." Specifically, Kwon stated the following:
    - "It's interesting that cockroaches only come out when the night is darkest," and that "[t]his thread should help you understand what's been going on & how the protocols(s) have responded recently."
    - "The Terra economy continued to be put under extreme test, with both Terra and Luna undergoing sharp contractions. Remember that idiot in the tg rooms that used to ask 'well, what if everyone starts selling stablecoins and Luna at once?' That scenario has indeed happened."
    - "Why has Luna supply been increasing over the last few days? That's what it's supposed to do. Luna is burned to create UST, and is minted to redeem UST – it's an elastic supply protocol. Sometimes economies contract, and Luna supply has increased the absorb it."
    - "But ser, what happened to Luna price? Note that the mechanism above makes demand for Luna cyclical to Terra's economic growth: during rapid growth, Luna does well as supply shrinks as fundamentals improve. During contractions, the opposite is true."
    - "On @Anchor\_Protocol, similar safe haven characteristics have been exhibited with new users coming in."
    - "Now, to the cockroaches: It's always been interesting how the cockroaches come out of the woodwork to spread FUD and

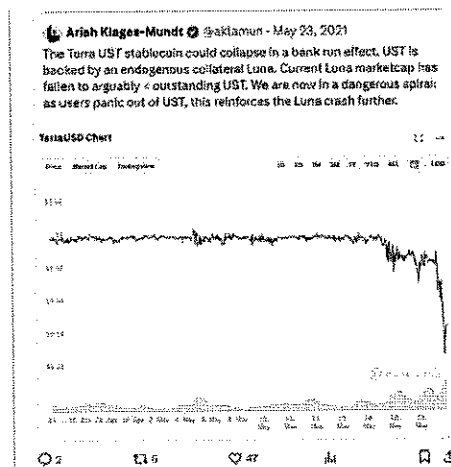
misinformation almost exclusively during the busiest and toughest of times.”

- “*Is \$UST growth manipulated by Terraform Labs? Nobody who’s used mirror or anchor could believe this* – but just for clarification we hold only ~59M \$UST. Reminder that there’s currently over 2B in UST stablecoins.” (Emphasis added).
- “In my view, *none of the fundamentals in the ecosystem have changed ... the ecosystem is significantly de-risked* for having survived one of the worst market crashes in crypto.” (Emphasis added).

b. On May 24, 2021, Terraform and Kwon issued tweets about UST’s purported recovery. Terraform issued a tweet (SEC Trial Exhibit 74) stating that “Terra’s not going anywhere, frens. \$1 parity on UST already recovered” and Kwon issued a tweet (SEC Trial Exhibit 75) stating “I see. Back to work” accompanied by a screenshot reflecting UST’s price as a \$1.00.

c. On May 24, 2021, Terraform issued a series of 29 tweets (SEC Trial Exhibit 57) touting the supposed triumph of “algorithmic, calibrated adjustments of economic parameters” over the “stress-induced decision-making of human agents in time of market volatility.” In these tweets, Terraform described the reliability of the UST \$1 peg as the “lynchpin for the entire [Terra] ecosystem” and boasted that it has purportedly proven its reliability in a “black swan” event that was “as intense of a stress test in live conditions as can ever be expected.” Specifically, Terraform stated the following:

- “[A]s an algorithmic stablecoin network, terra is akin to a decentralized open-source bank.”
- “Assets (LUNA) and liabilities (UST) maintain parity by the Terra protocol acting as a market maker, inflating the LUNA supply during UST contractions and deflating the LUNA supply during UST expansions.”
- “The ‘Death Spiral’ of a bank run applied to Terra’s ‘seigniorage shares’ style monetary policy is also not an apples-to-apples comparison.”



- “Yes, short-term reflexivity is a characteristic trade-off of algorithmic stablecoin designs, amplifying directional movements both ways, particularly during times of market stress and liquidity issues as investors rush for the exits.”
  - “However, *Terra is designed with explicit, real-time levers to combat the negative effects of endogenous collateral models (increasing tax rate on txs + cashflows to stakers) that traditional banking models cannot match.*” (Emphasis added).
  - “Plagued by the cumbersome nature of stress-inducing decision-making of human agents in times of market volatility, it’s why central banks are exploring CBDCs. *Algorithmic, calibrated adjustments of economic parameters are more effective than faxes and suits in meetings.*” (Emphasis added).
  - “Currently, *LUNA can easily shoulder the outstanding liabilities of UST, it just needs time to recalibrate and confidence restored – something that takes more than a weekend.*” (Emphasis added).
  - “UST’s demand is not a function of speculation like many other algo stables either. Instead, it serves as a lynchpin for the entire ecosystem, where the demand for using Terra envelopes the demand for UST.”
  - “And the use cases are already there. Chai has more than 2 million active users in Korea.”
  - “The protocol will keep arb opportunities open. Even if the incentives to do so are dislocated during ephemeral market turmoil, the incentives re-align and the system heals.”
  - “We just went through one insane market shock. But guess what? The peg is gradually normalizing again and will continue to do so as volatility subsides. Remember, volatility at this scale is ephemeral, not permanent.”
  - “The drawdown in the price of LUNA, UST peg deviation, and collateral effects across the ecosystem in such extreme market volatility *is about as intense of a stress test in live conditions as can ever be expected.* We just experienced a black swan.” (Emphasis added).
  - “Despite sharp dislocations, the on-chain spread is mending, UST peg is normalizing, and *UST’s role as a centerpiece of dean for the Terra ecosystem has not changed* – buttressing the growth of the Terra economy as the system bounces back from distress.” (Emphasis added).
- d. In a June 2021 Community Update on Medium (SEC Trial Exhibit 58), Terraform claimed that “the UST Peg has healed after a period of high volatility for the market across the board. Industry-wide volatility stress-tested the stability mechanism of the Terra protocol and posed unprecedented challenges to Anchor Protocol, but has also been incredible test of the protocol’s ability to continue providing stable yields (18-20%) under extreme conditions”

- e. In a September 9, 2021 Medium post (SEC Trial Exhibit 76), Kwon announced “the launch of Project Dawn,” which he described as “a new funding initiative for critical infrastructure improvements and core technologies to supplement the accelerating growth of the Terra ecosystem.” Specifically, Kwon claimed that Project Dawn had “commenced as of today with a 5 million LUNA unlocked and distributed by the TFL Genesis wallet (market value \$150M).” Kwon falsely represented that “TFL is committing to unlock at most 3 million Luna per month for all operating costs with details around each unlock transparently relayed to the community.” Kwon did not disclose that, in fact, the LUNA would be provided to Jump in accordance with the May 2021 deal he made.
  - f. In a March 2022 Twitter talk show (SEC Trial Exhibit 59), in which he discussed the May 2021 depeg, Kwon noted “it took a few days for the slippage cost to *naturally heal* back to spot” and explained that “the *protocol automatically self-heals* the exchange rate” (emphasis added).
- (5) Defendant acted with scienter or negligently when they disseminated one or more of the foregoing false and misleading statements.
- (6) One or more of the Defendants’ false and misleading statements were material to a reasonable investor.
- (7) Defendants obtained money or property as a result of their false and misleading statements.
- (8) Defendants’ false and misleading statements were in connection with the offer, purchase, or sale of a security.

#### **CHAI FRAUD SCHEME**

The following are the SEC’s contentions as to the disputed facts in this case regarding the Chai fraud scheme:

- (1) Chai did not use Terraform’s blockchain to process and settle its payment processing transactions.
- (2) Defendants acted negligently or with scienter when they copied actual Chai transactions on the Terraform blockchain.

(3) Defendants made false and misleading statements by explicitly and implicitly suggesting that Chai was processing and/or settling its payment transactions on the Terra blockchain. In these statements, Defendants used Chai's growth as a proxy for the growth and success of Terraform and falsely stated or implied that Chai's growing transaction volume represented real Terra blockchain transactions. Defendants also falsely represented that Chai merchants were actually paid in crypto assets and, thereby received benefits of faster processing times and lower transaction fees through Chai than through competitor mobile payment services providers.

(4) Specifically, Defendants made one or more of the following false and misleading statements with scienter or negligently regarding Chai:

- a. On June 21, 2019, Kwon made false and misleading statements in a Medium post (SEC Trial Exhibit 87), that "[w]e've been getting a lot of questions regarding how Chai uses Terra's blockchain. Quite simply Chai runs, records transactions, and manages account balances on Terra's columbus mainnet. Unique for blockchain services, it is integrated with most major banks in Korea such that the user can checkout with just a few clicks instead of having to manage wallet addresses, QR codes or private keys. Chai batches all the user purchase actions in a 10-15 second time window, and submits the batched tx to the Columbus blockchain. Each of these transactions pays a % stability fee, which gets rewarded each block to network stakeholders. Over the last 2 days, around 26k batch transactions have been made over Chai."
- b. On July 26, 2019, Kwon wrote (SEC Trial Exhibit 88) "[i]t's been 40 days since Chai launched using the Terra Protocol, and it already it is one of the most heavily used blockchain applications in existence. In one month, Chai's total transaction volume has cranked up by 667% since last month to hit over 10 billion KRW (\$8.5 million USD) as of this Wednesday. Cumulative users have hit over 240k+ and 1 billion KRW of daily transaction volume was hit on Monday. Not bad considering that it took 3 yrs for Venmo to acquire 3k users...Check out our neat infographic attached which summarizes Chai usage stats in its first 40 days!" The referenced infographic said "Blockchain services have struggled to build a meaningful user base. But from the moment it launched, Terra's blockchain-powered payments app started drawing in a crowd. On its first day, it gained over 11,000 users who simply added their bank accounts to



- start paying with blockchain technology. That number continues to grow rapidly, allowing anyone to easily buy their morning coffee with Terra.”
- c. In a September 23, 2019 email from Do Kwon to Terra investors (SEC Trial Exhibit 107), he announced that “Terra will strive to become the first blockchain payments network accepted everywhere, ringing truth to our slogan ‘Korea Runs on Terra’.”
- d. In a presentation aired on CNBC on October 14, 2019 (SEC Trial Exhibit 102b), Do Kwon touted the “phenomenal progress”, and explaining that “Chai is actually pretty simple. It just does pretty dumb down payments. Like in the front end, it’s a fully licensed payment gateway. It integrates with 14 of the top 15 banks in Korea such that the user doesn’t – only needs to pay in fiat and doesn’t have to interact with crypto so much. But in the back end, it uses Terra’s blockchain technology to solve some major pain points and problems for the merchants. So, first, on the surface, Terra offers the same seamless user experience as mainstream payment applications. At registration, the only thing that the user has to do is to link one of your bank accounts to the CHAI payment gateway, and then when they’re buying something, they just need to enter a six digit PIN in order to complete the transaction. There’s no need to worry about private keys or complicated wallet addresses because users shouldn’t have to worry about that. Users of the Internet don’t know how sockets work or how TCP/IP works. And we think this is going to be, you know, getting closer to what the end vision of blockchain is supposed to be -- solving problems in the back end, while causing no additional pain points for the user. But in the back end is where the real magic starts to happen. And I contend that Terra solves two of the biggest roadblocks to the adoption of digital payments in Asia and the rest of the world. So the first is, (inaudible) settlement periods. In Korea, it takes a traditional gateway five to seven days in order to settle a transaction. In Japan it takes up to 10 days. In Southeast Asia, it takes up to 14. And so settlement times have been one of the biggest problems for merchants adopting digital payments over cash in Asia. So if you’re a taxi driver, for instance, you live day-to-day. You need the money from the sale of one day to be able to buy food and fuel the next. And the same working capital problem persists if you’re an SMB like a restaurant, for instance, because you need the working capital right away in – in -- in many days to be able to buy ingredients, to pay off staff, and things like that. And simply, having to wait multiple days for the transaction to settle is untenable to that goal. Terra settles in six seconds. So every block for every transaction that has been made, we batch it up, and then send it to the merchant so that they can have easy and early access to working capital should they choose to do so.”
- e. In a February 9, 2020 Discord post (SEC Trial Exhibit 93a), Do Kwon claimed that “right now Chai has 12 merchants all of whom get settled on



the terra blockchain. Those of you with block literacy will be able to identify what these wallets are by looking through our explorers. I claim that based on some research of these merchants, it should be possible to examine the on-chain transaction patterns and map wallets to merchants.”

- f. In a Tweet posted on October 30, 2020 through @terra\_money (SEC Trial Exhibit 98), Terraform emphasized Chai’s use of the Terraform blockchain and highlighted its growth, stating: “1/ Eighteen new merchants integrated w/CHAI alongside #1 convenience store CU, meaning CHAI can now be used at nearly 18,000 OFFLINE stores across Korea! Furthering accessibility for CHAI’s 2 Million+ strong user base generates real-world transaction fees for \$LUNA holders” [sic]. That Tweet was accompanied by a graphic titled “Chai: Powered by Terra,” which contained a list of vendors purportedly participating in Chai’s payment platform.
- g. In an interview of Do Kwon published on March 19, 2021 (SEC Trial Exhibit 100), Do Kwon described Chai as “one of South Korea’s most popular payment apps” and claimed that “on the back-end, Chai uses Terra’s blockchain (stablecoins) to settle transactions faster and cheaper than legacy counterparts.” Do Kwon also claimed that “[l]ast year, Chai processed more than \$2.0 billion in transaction volume with more than 2.5 million users - making it one of the most successful and widely adopted applications that uses blockchain technology and is not purely speculative in nature.”
- h. In an interview on April 16, 2021 (SEC Trial Exhibit 101a), Kwon falsely claimed “today, Terra’s stablecoins are being used by 2.6 million people in Korea for payment transactions. And it turns out that with payments, user adoption is fairly sticky. So once you start to get into the habit of, let’s say buying milk or your diapers with a payment medium, you generally don’t switch for long periods of time. So if you’re able to raise the demand over time by building and diversifying the use cases that are built around the stablecoin then the stability profile of the currency gets much, much stronger.” Later in the interview, Do Kwon claimed “the business case is pretty simple. Using stablecoin networks to settle has two major benefits. So first, you are able to settle very quickly. So using traditional payment services, the average settlement time is about seven days. Which means that once a user pays on the ecommerce website for something, the payment gateway would enter a seven day delay for the money to be transferred to you, which is prohibitively expensive for a lot of different use cases. So, for example, if the platform works with lots of freelancers or smaller businesses, then in lots of these cases, these smaller businesses need the money right away because they have working capital issues. So a cab driver, for instance, might need the money right away to be able to put food on their family’s dinner table, or be able to pay for gas

for the next day's rides. And the same for small restaurants and things like that. So by not settling using traditional settlement networks but to settle to merchants directly in stablecoin, we're able to cut down settlement times from seven days to six seconds, which the average block time of the entire blockchain. And what we've also done is that we've added a lot of admin tools such that merchants can get analytics and understanding of how the revenues are coming from, swap out easily to fiat if they choose to. So I think bringing that value proposition to merchants has been very, very valuable."

- i. Kwon made false and misleading statements regarding Chai to Jonathan Kol, specifically that Chai's growing transaction volume and user metrics were drivers of growth for the Terraform blockchain.

(4) Defendants acted negligently or with scienter when they disseminated one or more of the above false and misleading statements.

(5) One or more of the Defendants' false and misleading statements were material to a reasonable investor.

(5) Defendants obtained money or property as a result of their false and misleading statements.

(6) Defendants' false and misleading statements were in connection with the offer, purchase, or sale of a security.

#### **B. Defendants' Contentions as to Disputed Facts**

Defendants object to the SEC's inclusion of the word "including" in its list of allegedly false and misleading statements and omissions above. All such alleged statements and omissions must be included in the pretrial order. The SEC should not be permitted to surprise Defendants and the Court with new alleged misstatements and omissions at trial. Because it is vital for pretrial preparation, Defendants will be contacting the Court to request a ruling on this issue in advance of the pretrial conference."

**MAY 2021 DEPEG**

The following are the Defendants' contentions as to the disputed facts in this case regarding the May 2021 depeg:

1. The risk of UST losing its price peg was publicly-known and disclosed to any potential purchaser.
2. It was publicly disclosed and broadly known that the mint/burn mechanism itself required human intervention as part of its operation, because a user had to (1) burn LUNA or UST in exchange for getting UST or LUNA from the mechanism and then (2) sell what the user received to obtain the profit. For example, when UST was worth 90 cents, a user would burn their UST in the mechanism and receive \$1.00 worth of LUNA, which they would then sell or trade to realize their 10 cents of profit.
3. The possibility that open market intervention might be needed to help maintain UST's \$1.00 peg was publicly disclosed and known through, for example, the establishment of a stability reserve and the creation of the Luna Foundation Guard.
4. The community was well aware of TFL and Jump's ongoing business relationship both as a liquidity provider and general business partner. This relationship preceded the May 2021 depeg.
5. The partnership between TFL and Jump was publicly disclosed on several Agora governance proposals, which evidenced Jump's integral role in adjusting liquidity parameters.
6. Defendants did not secretly arrange for, or agree with, Jump to make bulk purchases of UST to drive the price of UST back to \$1.00 in May 2021.
7. Jump's trading in May 2021 did not restore the peg.

8. The role of a market maker is not to drive the price of an asset but to create liquidity for the market.

9. The price of UST recovered and stabilized during the period when Jump was not actively trading.

10. It was not until July 2021, months after the May 2021 depeg, that TFL and Jump negotiated and entered into a Second Amended and Restated Loan Agreement that removed vesting conditions that Jump had already met and extended the LUNA delivery schedule, which was contrary to Jump's interest because it would only receive 1.2M LUNA per month rather than all at once.

11. The statements of Defendants regarding the May 2021 Depeg which the SEC has quoted portions above were true and not false or misleading.

12. The statements made about what caused UST's peg to recover in May 2021 were true and not false or misleading.

13. The statements made about the stability of UST were true and not false or misleading.

14. The statements made by Defendants during the May 2021 depeg about UST or the peg were true and not false or misleading.

15. The statements made by Defendants post May 2021 depeg were true and not false or misleading.

16. Following the May 2021 depeg, the potential for another depeg was publicly discussed at length and disclosed to potential purchasers.

17. Defendants did not act with scienter, negligence or recklessness because the statements surrounding the May 2021 depeg were true and not false or misleading.

18. The alleged statements are not material to a reasonable purchaser because there is not a substantial likelihood they would have considered such statements important in deciding whether or not to buy or sell UST, LUNA, wLUNA, or MIR.

19. Any alleged “omissions” are also not material because there is not a substantial likelihood that a reasonable purchaser would have viewed the disclosure of that fact as significantly altering the total mix of information publicly-available in deciding whether to buy or sell UST, LUNA, wLUNA, or MIR.

20. The existence of any alleged “secret” agreement between TFL and Jump is not material because there is not a substantial likelihood that a reasonable purchaser would have viewed the disclosure of that fact as significantly altering the total mix of information publicly-available in deciding whether to buy or sell UST, LUNA, wLUNA, or MIR.

21. Defendants did not receive any direct or indirect benefit as a result of the alleged material representations and omissions.

22. While the Court has ruled that UST, LUNA, MIR and wLUNA constituted securities, Defendants disagree with this finding and dispute that Defendants’ alleged material misrepresentations and omissions were in connection with the offer, purchase, or sale of a security.

### CHAI

The following are Defendants’ contentions as to the disputed facts in this case regarding Chai:

1. 100% of Chai transactions were executed on the Terra blockchain.
2. Chai processed and settled transactions on the Terra blockchain.
3. All Chai payments made by Chai users were executed on the blockchain by commands executed by those users.

4. Chai transactions were executed on the Terra blockchain, not simply mirrored or copied, transferred actual value between parties to the Chai transactions, and were by design settled and accurately recorded on the Terra blockchain ledger.

5. The LP Server received the commands of Chai users and executed those on the Terra blockchain, converting it and storing Chai's ledger data on the Terra blockchain.

6. The LP Server received and processed Chai transaction data involving customers and merchants in real-time.

7. TFL bought and sold KRT for KRW on behalf of Chai, which was publicly disclosed on social media used by the Terra community.

8. The use of KRT to process and settle Chai transactions was publicly disclosed and discussed by Defendants.

9. When Chai merchants were paid in fiat currency, they were paid according to their agreement between TFL, Chai, and the merchant.

10. Chai transactions on the Terra blockchain were real and the execution of those transactions resulted in fees accruing to LUNA stakers/validators.

11. Chai relied on the LP Server to batch/execute transactions and used the Terra blockchain and the stablecoin economy in the payments process to offer lower transaction fees and ongoing discounts.

12. The statements of Defendants regarding Chai of which the SEC has quoted only portions above were true and not false or misleading.

13. The statements made by Defendants about Chai's growth were true and not false or misleading.

14. The statements made by Defendants regarding Chai and its use of the blockchain were true and not false or misleading.

15. Defendants did not act with scienter, negligence, or recklessness in making the statements concerning Chai and the Terra blockchain because the statements were true and not false or misleading.

16. The alleged misstatements concerning Chai were not material because there is not a substantial likelihood that a reasonable purchaser would have considered such statements important in deciding whether or not to buy or sell UST, LUNA, wLUNA, or MIR.

17. Any alleged “omissions” concerning Chai are also not material because there is not a substantial likelihood that a reasonable purchaser would have viewed the disclosure of the omitted fact as significantly altering the total mix of information publicly-available in deciding whether to buy or sell UST, LUNA, wLUNA, or MIR.

18. Defendants did not receive any direct or indirect benefit as a result of the alleged material misrepresentations and omissions.

19. While the Court has ruled that UST, LUNA, MIR and wLUNA constituted securities, Defendants disagree with this finding and dispute that Defendants’ purported statements were in connection with the offer, purchase, or sale of a security.

## **V. RELIEF SOUGHT BY PLAINTIFF**

The SEC seeks only a finding of liability from the jury. Following a verdict or judgment in its favor, the SEC would seek from the Court (1) equitable relief in the form of disgorgement, prejudgment interest, and an injunction, and (2) civil money penalties against each defendant.

Defendants have no claims or counterclaims.



**VI. WITNESS LISTS IN LIKELY ORDER OF APPEARANCE**

**A. Plaintiff's Witness List**

- (1) Arash Vakil
- (2) Boris Revsin
- (3) Jonathan Kol
- (4) Ashwin Mathialagan (Terraform corporate representative) (by video deposition)
- (5) Aaron Myung
- (6) Christopher Ferrante
- (7) Paul Kim (by testimony designation)
- (8) Dr. Matthew Edman
- (9) Do Hyeong Kwon (by testimony designation)
- (10) Nader George (to testify on Friday, March 29)
- (11) James Hunsaker (to testify by Friday, March 29)
- (12) Brian Curran
- (13) Jeff Kuan (live or by deposition designation)
- (14) Brandon Ackley
- (15) Matthew Lambert
- (16) Kanav Kariya (by deposition designation)
- (17) William DiSomma (by deposition designation)
- (18) Dr. Bruce Mizrach

**B. Defendant's Witness List**

The Defendants' witnesses are subject to addition depending on the evidence presented by the SEC.

- (1) Arrash Christropher Amani
- (2) Matthew Cantieri
- (3) Do Hyeong Kwon (Deposition)

- (4) Paul Kim (Deposition)
- (5) Seungjin Jacob Park
- (6) Zion Schum
- (7) Evgeny Gaevoy (Deposition)
- (8) Marina Gurevich (Deposition)
- (9) Custodian of Record, Jump Trading
- (10) Terrance Hendershott

May Call Witness List:

- (1) Chris Drew
- (2) Will Chen (Deposition)

**VII. EXHIBIT LISTS WITH PARTICULARIZED OBJECTIONS NOTED IN ACCORDANCE WITH FED. R. EVID. 26(a)(3)**

**A.** Attached as **Exhibit A** is a list of exhibits that the SEC intends to offer in its case in chief, with any objections by Defendants to such exhibits noted in the column at the right.

**B.** Attached as **Exhibit B** is a list of exhibits that Defendants intend to offer in their cases in chief, with any objections by the SEC to such exhibits noted in the column at the right.

**VIII. ESTIMATED LENGTH OF TRIAL**

The parties estimate the trial will last approximately 10 full trial days.

Dated: March 22, 2024

Respectfully submitted,

/s/ James P. Connor

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Carina Cuellar, admitted *pro hac vice*  
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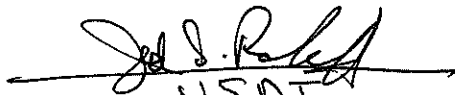
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*Counsel for Defendant Do Hyeong Kwon*

SO ORDERED  
  
USDJ  
3-25-24

# EXHIBIT A

**Joint Pre-Trial Order, Exhibit A**  
**Plaintiff's Exhibit List with Defendants' Objections**

<b>Trial Ex. Number</b>	<b>Bates Range</b>	<b>Date</b>	<b>Document Description</b>	<b>Def. Objections</b>
1	ACCMGMT00000374-97	N/A	Investor slides titled "Terra, Powering the innovation of money"	FRE 401: Relevance*; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
2	GD_MIR00004365	2020.01.21	Kol email	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
3	GD_MIR00004346	2020.08.24	Kol email	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
4	GD_MIR00002442	2020.09.03	Google Calendar Event	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
5	GD_MIR00004186-87	2020.09.04	email from Jonathan Kol to Greg Wasserman	FRE 403: Prejudice; FRE 802: Hearsay
6	GD_MIR00049937	2020.09.10	Kol email	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
7	GD_MIR00002436	2020.09.15	Google Calendar Event	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
8	GD_MIR00006627-35	2020.10.XX	document titled "Terra - Long Duration Trade Memo"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
9	GD_MIR00004429-58	2020.10.27	Luna Token Sale Agreement by Galaxy Digital	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
10	GD_MIR00007315	2020.10.28	Kol email	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
11	GD_MIR00000501	2021.01.29	Kol email	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
12	GD_MIR00055443	2020.12.29	Kol chat with DK	FRE 403: Prejudice; FRE 106: Rule of Completeness; FRE 802: Hearsay; FRE 901: Authentication
13a	GD_MIR00002404	2021.11.03	Email/attachment SJ Park to Jonathan Kol	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
13b	GD_MIR00002405-17	2021.11.03	Email/attachment SJ Park to Jonathan Kol Attachment Terra_Oct21pdf	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
14	GD_MIR00019857	2022.05.17	MN email	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
15	SEC-GeorgeN-E-0000062		Nader George Wire	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
16	SEC-GeorgeN-E-0000001		Nader George Kraken Trades	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
17	SEC-GeorgeN-E-0000002		Nader George Kraken Trades	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
18	SEC-GeorgeN-E-0000003		Nader George Kucoin Deposits	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
19	SEC-GeorgeN-E-0000004		Kucoin George Trades	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
20	SEC-GeorgeN-E-0000048		Nader George Purchase & Sale Records	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
21	SEC-GeorgeN-E-0000061		Nader George UST Transactions	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
24a	TRIB00001701-02	2021.11.16	Forwarded email/attachment from Arjun Sethi to Revsin re: Do Kwon Terra Forex	FRE 403: Prejudice; FRE 802: Hearsay
24b	TRIB00001703-15	2021.11.16	Forwarded email/attachment from Arjun Sethi to Revsin re: Do Kwon Terra Forex - Attachment Terra fundraise deck (Oct 2021)	FRE 403: Prejudice; FRE 802: Hearsay
25	TRIB00001626-27	2021.11.16	Email Chain Sethi/Revsin direct buy from Terra	FRE 403: Prejudice; FRE 802: Hearsay
26	TRIB00001622	2021.11.16	Email introduction Revsin to Jeff Kuan for direct contact	FRE 403: Prejudice; FRE 802: Hearsay
27a	TRIB00001294	2021.11.19	Email/attachment from Revsin to Sethi Terra Memo	FRE 403: Prejudice; FRE 802: Hearsay
27b	TRIB00001295-98	2021.11.19	Email/attachment from Revsin to Sethi Terra Memo - Attachment Terra-Investment Round pdf	FRE 403: Prejudice; FRE 802: Hearsay
28	RCAP.MAY.16.22.00433	2021.12.08	Email Pherson to Goldich bcc Revsin Lunar Found. OTC TSA draft	FRE 401: Relevance; FRE 802: Hearsay; FRE 403: Prejudice
29	RCAP.MAY.16.22.10742-44	2022.01.25	Email DocuSign obo Goldich to Revsin OTC TSA agreement sign	No Objection
30	RCAP.MAY.16.22.00001-03	2022.01.31	Email chain Revsin/Goldich/Pherson/etc re Republic buy	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
31	RCAP.MAY.16.22.00074-77	2022.02.07	email chain: re Republic buy in	FRE 401: Relevance; FRE 802: Hearsay; FRE 403: Prejudice

32	RCAP.APR.22.22.00011-38	2022.01.25	Token Sale Agreement Rcapital Terranova	No Objection
33	RCAP.MAY.16.22.00054-57	2022.01.31	Email chain between Republic and Defendants	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
34	SEC-VakilA-E-0000001		Vakil UST Purchase and Sales	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
37	SEC-HydeM-E-0000001		Hyde UST trades spreadsheet	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
38	SEC-HydeM-E-0000002		Hyde Kucoin transactions	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
39	SEC-HydeM-E-0000003		Hyde UST transactions	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
40	SEC-HydeM-E-0000004		Hyde UST transactions	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
41	SEC-HydeM-E-0000005		Hyde UST summary	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
44	TRIB00000499-505	2021.12.04	Email chain: Tribe to buy \$500mm	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802:Hearsay; FRE 403: Prejudice
45	TRIB00002167-76	2022.01.XX	Tribe Terra Memo	FRE 401: Relevance; FRE 802: Hearsay; FRE 403: Prejudice
46	TRIB00000777-79	2022.01.11	Email chain Tolve/Goldich/Pehrson KYC questionnaire	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802:Hearsay; FRE 403: Prejudice
47	TRIB00002410-19	2022.01.22	Email chain re Tribe Terra buy	FRE 401: Relevance; FRE 802: Hearsay; FRE 403: Prejudice
48	TRIB00001796-98	2022.01.02	Email chain re: announcements	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802:Hearsay; FRE 403: Prejudice
49	TRIB00002630-36	2022.02.03	Email chain re LUNA token purchase \$57mm	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802:Hearsay; FRE 403: Prejudice
50	TRIB00002846-73	2022.01.24	TSA Tribe Crypto Aggregator I Limited	No Objection
51	TRIB00000685	2021.12.07	Email Lunarfoundation to Matt@tribe re: foundation establishment	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 403: Prejudice
52	TRIB00002587	2022.02.16	Email Pehrson to Tribe employees re: LUNA delivery	FRE 401: Relevance; FRE 802: Hearsay; FRE 403: Prejudice
53	TRIB00002724-25	2022.02.06	Email chain Kwon and Paul Lee re: Seth's concerns about Terra	FRE 401: Relevance; FRE 404: Improper Character Evidence; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 403: Prejudice
54	N/A	2023.06.19	Basic Court in Podgorica First instance decision against Do Kwon	FRE 401: Relevance; FRE 403: Prejudice; FRE 404: Improper Character Evidence
55a	N/A	2023.06.19	Translation of Basic Court in Podgorica First instance decision against Do Kwon_2023.06.19	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
55b	N/A	2024.02.09	Translation certification	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
56	N/A	2021.05.23	Do Kwon 18 long Tweet thread (@d0h0k1)	FRE 401: Relevance; FRE 403: Prejudice
57	N/A	2021.05.24	Terra (@terra_money) 29 long Tweet thread	No Objection
58	N/A	2021.06.02	Medium.com post "May 2021 Community Update"	FRE 403: Prejudice; FRE 802: Hearsay
59	N/A	2022.03.01	transcript posted on the terraspace.org website titled "The Ship Show Ep 1 Kanav Kariya and Do Kwon Talk DeFi."	No Objection
60	SEC-JUMPTRADE-E-0000074-79	2020.09.08	Loan Confirmation up to \$65mm Terraform Labs Limited Tai Mo Shan Limited	No Objection
61	SEC-JUMPTRADE-E-0002701-02	2021.01.20	Email CJ Han to Vlad Kaganovsky	No Objection
62	SEC-JUMPTRADE-E-0002759-61	2021.02.21	Email CJ Han to Kanav Kariya	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
63	TFL_SEC_00216610-11	2021.03.02	Email Vlad Kaganovsky to others	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
64	SEC-JUMPTRADE-E-0001390	2021.03.13	Email CJ Han to Kanav Kariya	No Objection
65a	SEC-JUMPTRADE-E-0001748	2021.04.02	Email from Tak Fujishima to John Nagel, Kwon, Kariya re: Loan amendment	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
65b	SEC-JUMPTRADE-E-0001749-53	2021.04.02	Email from Tak Fujishima to John Nagel, Kwon, Kariya re: Loan amendment Attachment: Please Docusign Luna Amendment	No Objection

66	SEC-JUMPTRADE-E-0001394	2021.04.07	Email CJ Han to Kanav Kariya	No Objection
67	SEC-JUMPTRADE-E-0002713-16	2021.04.27	Email CJ Han to Kanav Kariya	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
68	JUMP_SEC_TERRA_0001956-57	2021.05.24	document showing a conversation between William DiSomma and others	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
69a	JUMP0085523-24	2021.07.22	email sent on behalf of John Nagel to Crypto LegalDocs and others	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
69b	JUMP0085525-26	2021.07.22	email sent on behalf of John Nagel to Crypto LegalDocs and others - attachment LUNA Terra Loan Confirmation Second Amended and Restated July 13 2021	No Objection
70	SEC-JUMPTRADE-E-0000978	2021.08.31	Email Simon Johansen to others	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
71	TFL_SEC_00238438-41	2021.05.23	conversation between Brian Curran and Jeff Kuan	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
72	TFL_SEC_00180470-73.	2021.05.23	"Weekly HQ Call -- 05/23"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
73	HO-14164_JK_09011-12	2021.10.06	conversation between Brian and Jeff	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
74	N/A	2021.05.24	Terra (@terra_money) tweet	FRE 403: Prejudice
75	N/A	2021.05.24	Do Kwon (@stablekwn) tweet -	No Objection
76	N/A	2021.09.09	Medium.com post "Introducing Project Dawn"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
77	JUMP_SEC_TERRA_0000001 - JUMP_SEC_TERRA_0000003		Jump Trading Records	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
78	N/A	2020.07.06	Medium.com post "Introducing Anchor"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
79	N/A	2021.03.15	Do Kwon (@stablekwn) tweet - Anchor	FRE 401: Relevance; FRE 403: Prejudice
80	N/A	2022.02.22	tweet from @terra_money "1/ The long awaited [REDACTED]..."	FRE 401: Relevance; FRE 403: Prejudice
81	N/A	2022.05.04	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
82	N/A	2021.05.18-31	price chart of TerraClassicUSD (formerly UST) - showing the May 23 depeg	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
83	N/A	2022.03.11	tweet from @stablekwn "If there is any confusion left at this point, we will keep growing reserves until it becomes mathematically impossible for idiots to claim depeg risk for \$UST \$UST is mighty"	FRE 401: Relevance; FRE 802: Hearsay; FRE 901: Authentication; FRE 403: Prejudice
84	N/A		Timeline of Evidence (Jump)	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 1006: Improper Summary; Pleadings: not admissible
85	N/A		Summary of Evidence (Market Value chart)	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; FRE 1006: Improper Summary
86	TFL_EMP_00057164	2022.04.09	Signal Chat between Zion Schum and Brian Curran "When Jump bailed us out in 2021..."	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
87	N/A	2019.06.21	Medium.com Post "June 2019 Terra Community Update"	No Objection
88	N/A	2019.07.26	Medium.com post "July 2019 Terra Community Update"	No Objection
89	N/A	2019.10.24	Medium.com post "In numbers: Four Months of Chai"	FRE 403: Prejudice; FRE 802: Hearsay
90	N/A	2019.10.27	Medium.com post "October 2019 Terra Community Update"	No Objection
91	AXRP0011339-43	2019.10.27	Email from Kwon to Terra Investor Relations re: Terra Investor Update (October)	No Objection
92	N/A	2020.02.09	Do Kwon Tweet (@stablekwn)	No Objection
93a	N/A	2020.02.09	screen capture of a post by Do Kwon on the Terra Classic Discord server	FRE 403: Prejudice; FRE 901: Authentication
93b	N/A	2023.10.24	declaration for the capture of a post from February 9, 2020 on the Terra Classic Discord server.	FRE 403: Prejudice; FRE 802: Hearsay
94	ZFZ000915	2020.04.22	Medium.com post "Terra Ecosystem Update: CHAI's Expansion - Integration into Toomics & Happy Money"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
95	AXRP0012202-05	2020.07.03	Email Daniel Hwang to Terra Investor Relations	No Objection



96	HOF00003620-22	2020.08.02	Email from Hwang to Terra Investor Relations re: Terra July Investor Update	No Objection
97	N/A	2020.10.01	Medium.com post "Monthly Community Update September 2020" author Sarah Kim	No Objection
98	N/A	2020.10.30	Terra (@terra_money) tweet	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
99	N/A	2020.11.03	Medium.com post "October 2020 Community Update"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
100	N/A	2021.03.19	The Tokenist article "Interview: Terra CEO Discusses Luna, Mirror, Chai, Terraswap, More"	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
101a	N/A	2021.04.16	Audio file of Kwon interview in email from The Defiant	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
101b	N/A		Capture of podcast page	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
101c	N/A		Webcapture declaration	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
101d	POLY10039751-76	2021.04.16	Kwon interview in email from The Defiant to niraj@polychain.capital	FRE 403: Prejudice; FRE 802: Hearsay
102a	N/A	2019.10.14	transcript (with certification) of a video of an October 14, 2019 presentation by Do Kwon on CNBC Africa titled "Korea Runs on Terra"	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Transcript--not evidence
102b	N/A	2019.10.14	copy of a video of an October 14, 2019 presentation by Do Kwon on CNBC Africa titled "Korea Runs on Terra"	No Objection
103a	N/A	2022.03.31	YouTube webpage with a video entitled "Do Kwon: Why Terra is Buying \$10 Billion Bitcoin"	FRE 401: Relevance; FRE 403: Prejudice
103b	N/A	2022.03.31	transcript (and certification) of a video entitled "Do Kwon: Why Terra is Buying \$10 Billion Bitcoin"	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
103c	N/A	2022.03.31	video entitled "Do Kwon: Why Terra is Buying \$10 Billion Bitcoin"	FRE 401: Relevance; FRE 403: Prejudice
104a	SEC-HO-14164-E-0002485-90	2019.03.01	Forwarded email/attachment	FRE 401: Relevance; FRE 403: Prejudice
104b	SEC-HO-14164-E-0002491-93	2019.03.01	Attachment Terra Investor Update - December 2018	FRE 401: Relevance; FRE 403: Prejudice
105	SEC-HO-14164-E-0002721	2019.06.12	Email Shin to Joon Choi (encore company)	FRE 403: Prejudice; FRE 901: Authentication
106a	SEC-HO-14164-E-0002691-2700	2019.08.12	Email Shin "Encore Update #6"	FRE 403: Prejudice; FRE 901: Authentication
106b	SEC-HO-14164-E-0002701-05	2019.08.12	Email Shin "Encore Update #6" - Attachment (korean)	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 901: Authentication
107	SEC-HO-14164-E-0002504-10	2019.09.24	email Shin forwarded update from Kwon to investors	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
108a	SEC-HO-14164-E-0002550-52	2019.11.10	Email /attachment between Shin and Myung re: Chai	FRE 401: Relevance; FRE 403: Prejudice
108b	SEC-HO-14164-E-0002553-80	2019.11.10	Email /attachment between Shin and Myung re: Chai - Attachment CHAI Proposal Deck ENG	FRE 401: Relevance; FRE 403: Prejudice
109	SEC-HO-14164-E-0002673-78	2019.12.04	email chain re: employment	FRE 401: Relevance; FRE 403: Prejudice
110a	SEC-HO-14164-E-0002626-29	2020.01.07	email chain re: chai "engineering more robust" plus attachment	FRE 401: Relevance; FRE 403: Prejudice
110b	SEC-HO-14164-E-0002630-35	2020.01.07	email chain re: chai "engineering more robust" plus attachment - Chai Promotion AB Test Spec v1.0	FRE 401: Relevance; FRE 403: Prejudice
111a	SEC-HO-14164-E-0002588	2020.01.31	Email re: terra 2020 roadmap and attachment	FRE 401: Relevance; FRE 403: Prejudice
111b	SEC-HO-14164-E-0002589-2602	2020.01.31	Email re: terra 2020 roadmap and attachment - Attachment Terra 2020 Roadmap pptx	No Objection
112a	ZFZ_002074-75	2021.01.18	CHAI employment agreement Myung (Korean)	FRE 401: Relevance; FRE 403: Prejudice
112b	ZFZ_002074-75	2021.01.18	CHAI employment agreement Myung (translation)	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
113a	ZFZ_002079	2021.01.18	CHAI salary agreement Myung (Korean)	FRE 401: Relevance; FRE 403: Prejudice
113b	ZFZ_002079	2021.01.18	CHAI salary agreement Myung (translation)	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
114	ZFZ_002076	2018.05.15	Confirmation of Non-Issuance of Share Certificates	FRE 401: Relevance; FRE 403: Prejudice
115	SEC-HO-14164-E-0000089	2021.12.XX	screenshot of terraform website	No Objection
116	SEC-HO-14164-E-0000148	2021.12.XX	screenshot of "Chaiscan" website	No Objection
117	SEC-HO-14164-E-0002867-97	2021.06.XX	chai investor deck	FRE 401: Relevance; FRE 403: Prejudice
118a	SEC-HO-14164-E-0000118	2021.08.13	Slack Chat Shin/Myung	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay

118b	SEC-HO-14164-E-0000084	2021.08.13	screenshot of Kwon interview article	No Objection
119	SEC-HO-14164-E-0002823-24	2021.08.15	Slack Chat Shin/Myung	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
120	N/A	2021.01.18 through 2022.03.21	Kakao communications between Myung and Kwon	FRE 401: Relevance; FRE 403: Prejudice
121	SEC-HO-14164-E-0002820-21	2021.09.30	Slack chat Kim/Myung re: Chai/Terraform connection	FRE 403: Prejudice; FRE 802: Hearsay
122a	SEC-HO-14164-E-0002438	2021.10.08	recorded conversation Kim/Myung	FRE 403: Prejudice; FRE 802: Hearsay
122b	N/A	2021.10.08	certified transcript of recording	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Transcript—not evidence
123a	SEC-HO-14164-E-0002439	2021.10.14	recorded conversation Baek/Myung	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
123b	N/A	2021.10.14	certified transcript of recording	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
124a	SEC-HO-14164-E-0002430	2022.02.23	Shin/Myung video call	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
124b	N/A	2022.02.23	certified transcript of recording	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; Transcript—not evidence
125a	SEC-HO-14164-E-0002435	2022.03.14	GiGi Kwon/Myung video call	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
125b	N/A	2022.03.14	certified transcript of recording	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; Transcript—not evidence
127a	N/A	2022.05.13	Chai App Screenshot of Official Notice - May 13, 2022 (korean)	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
127b	N/A		Translation	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Transcript—not evidence
128a	N/A	2022.06.12	Chai App Screenshot Official Notice - June 12, 2022 (korean)	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
128b	N/A		Translation	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Transcript—not evidence
129	N/A		Translation Certification	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
130	SEC-SEC-E-0002278-85	2021.10.16	TCR ID 854815	No Objection
131	SEC-SEC-E-0002286-93	2021.10.16	TCR ID 854817	No Objection
132	SEC-SEC-E-0002265-77	2021.10.02	TCR ID 853511	No Objection
133	SEC-SEC-E-0002294-303	2022.02.25	TCR ID 871227	No Objection
134	TFL_SEC_00275960	2021.09.26	Email from Myung to Shin and Kwon re: My Future at Chai	No Objection
135a	SEC-HO-14164-E-0002714-16	2022.03.10	Letter from DR & AJU LLC attorneys to Chai re: "Request for Explanation on Easy Payment Service Chai's Terra(KRT) Payment Transaction System Structure" (korean)	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
135b	SEC-HO-14164-E-0002714-16	2022.03.10	Letter from DR & AJU LLC attorneys to Chai re: "Request for Explanation on Easy Payment Service Chai's Terra(KRT) Payment Transaction System Structure" (translation)	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; Transcript—not evidence
136	ZFZ_001348	2022.01.20	Slack Chat between Aaron and Brian Jung re: investors thinking Chai uses Terra	FRE 403: Prejudice; FRE 106: Rule of Completeness; FRE 802: Hearsay; FRE 901: Authentication
137	N/A	2019.06.11	Medium.com post "Terra partners with mobile payment app CHAI to service the growing eCommerce market"	No Objection
138a	TFL_SEC_00244681-689	2019.08.23	Yanloja Agreement with Chai - ECF 125-19	No Objection
138b	Translation of TFL_SEC_00244681-689	2019.08.23	Translation of Yanloja Agreement with Chai - ECF 125-19	No Objection
139a	TFL_SEC_00244690-93	2019.10.1	Chai Service Promotion Support Agreement: Yanlojha Co./Chai Corp./Terraform Labs PTE LTD ECF 125-18	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
139b	Translation of TFL_SEC_00244690-93	2019.10.1	Translation of Chai Service Promotion Support Agreement: Yanlojha Co./Chai Corp./Terraform Labs PTE LTD ECF 125-18	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Transcript—not evidence
140	TFL_SEC_00238641-52	2019.05.09	slack chat btw Daniel Shin and Do Kwon	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay

141a	TFL_SEC_00237653-62	2019.06.09	conversation titled "dev-core"	FRE 401: Relevance; FRE 403: Prejudice
141b	TFL_SEC_00237653-3 (sic)	2019.06.09	Certified translation of conversation titled "dev-core"	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
142a	TFL_SEC_00237746-47	2019.06.10	conversation titled "dev-core"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
142b	TFL_SEC_00237746-46 (sic)	2019.06.10	Certified translation of conversation titled "dev-core"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; Transcript--not evidence
143a	TFL_SEC_00240269-73	2019.06.13	DK GK conversation titled "mktcomms"	FRE 403: Prejudice
143b	TFL_SEC_00240269-69 (sic)	2019.06.13	DK GK Certified translation of conversation titled "mktcomms"	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
144a	TFL_SEC_00237916-18	2019.09.06-07	conversation titled "dev-old-station"	FRE 403: Prejudice
144b	TFL_SEC_00237916-18	2019.09.06-07	Certified translation of conversation titled "dev-old-station"	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
145a	TFL_SEC_00237919-21	2019.09.08	conversation titled "devold-station"	FRE 401: Relevance; FRE 403: Prejudice
145b	TFL_SEC_00237919-9 (sic)	2019.09.08	Certified translation of conversation titled "devold-station"	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
146a	TFL_SEC_00196954	2019.09.25	email from Quip to CJ Han	No Objection
146b	SEC-TFL-E-0000377	2019.09.25	translation of email by Defendants from Quip to CJ Han	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
147a	TFL_SEC_00221424-25	2019.10.10	Email from Daniel Shin to Bob Scully - WITH ATTACHED "SAMPLE AGREEMENT"	No Objection
147b	TFL_SEC_00221426-40	2019.10.10	Email from Daniel Shin to Bob Scully - ATTACHMENT 1 - Chai Proposed Deck	No Objection
147c	TFL_SEC_00221441-49	2019.10.10	Email from Daniel Shin to Bob Scully - ATTACHMENT 2 - Chai Service Agreement Sample Portions	FRE 403: Prejudice; Portions of this exhibit are not in English, and there is no translation
147d	TFL_SEC_00221450	2019.10.10	Email from Daniel Shin to Bob Scully - - ATTACHMENT 3 - Deal Terms by Merchant	No Objection
147e	TFL_SEC_00221451-55	2019.10.10	Email from Daniel Shin to Bob Scully - - ATTACHMENT 4 - Promotion Supplementary Agreement Sample Portions	Portions of this exhibit are not in English, and there is no translation
148a	TFL_SEC_00237912-15	2019.12.11	conversation titled "dev-core"	No Objection
148b	TFL_SEC_00237912-12 (sic)	2019.12.11	Certified translation of conversation titled "dev-core"	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
149	ACCMGMT00001341-43	2020.02.06	email from Do Kwon to Terra Investor Relations	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice
150a	TFL_SEC_00197784-85	2020.03.02	email from Do Kwon to Terra Team	No Objection
150b	TFL_SEC_00197786-87	2020.03.02	attachment to email from Do Kwon to Terra Team - Thoughts on Compliance	FRE 403: Prejudice
151	TFL_SEC_00195686-710	2020.03.03	conversation between Paul Kim and Will Chen	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
152a	TFL_SEC_00239413-15	2020.04.21	conversation between Paul Kim and Yun Yeo	FRE 106: Rule of Completeness; FRE 403: Prejudice
152b	TFL_SEC_00239413-15	2020.04.21	Certified translation conversation between Paul Kim and Yun	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
153	SEC-KFSC-E-0000344-54	2020.05.19	Development Grant Master Agreement with dsrv labs	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice
154	N/A	2020.05.25	Do Kwon (@stablekwn) tweet re: Chaiscan	FRE 401: Relevance; FRE 403: Prejudice
155	SEC-MAS-E-0001442-3	2020.05.26	email from Raghav Rastogi to Brian Jung	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay
156	N/A	2020.06.19	Medium.com post "The role of transaction fees in network valuation and security"	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay
157	TFL_EMP_00055768-71	2020.08.20	conversation titled "Terra < Zengo Integration Working Group"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
158	TFL_SEC_00214200-01	2020.09.22	conversation between Nicolas Andreoulis and Paul Kim	FRE 106: Rule of Completeness; FRE 403: Prejudice
159	TFL_SEC_00214227-29	2020.10.09	conversation between Etienne Napoleone and Paul Kim	FRE 106: Rule of Completeness; FRE 403: Prejudice
160	N/A	2020.10.30	tweet from @terra_money re: 3/ Track CHAI stats on chaiscan	No Objection
161	N/A	2021.05.10	Do Kwon (@stablekwn) tweet re: KRT topups	No Objection
162a	TFL_SEC_00244252-53	2021.10.18	email from jinyeongseol@yanolja.com to Woonam Jung	No Objection
162b	TFL_SEC_00244252-53	2021.10.18	certified translation of an email from jinyeongseol@yanolja.com to Woonam Jung	No Objection
163	TFL_SEC_00268472-75	2022.02.28	conversation between Michael Brown and Paul Kim	FRE 106: Rule of Completeness; FRE 403: Prejudice
164	TFL_SEC_00268421-23	2022.06.22	conversation between Do Kwon and Zion Schum	FRE 401: Relevance; FRE 403: Prejudice

165	N/A	2023.09.27	Certification of Translation Accuracy by Latitude Prime certifying the accuracy of the translation for among other documents Bates-labeled: TFL_SEC_00244252-3, TFL_SEC_00227368, TFL_SEC_00222092-4, TFL_SEC_00240269-73, TFL_SEC_00237653-62, TFL_SEC_00237746-47, TFL_SEC_00237919-21, TFL_SEC_00237912-15 and TFL_SEC_00237916-8.	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
166	TFL_SEC_00182107-08	N/A	List of "Merchant Wallets," and the top of the first page	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
167	SEC-MAS-E-0001129-31	2023.09.21	Declaration made by Rahul Abrol on behalf of PortOne Holdings Pte. Ltd. (f/k/a Chai Pay Holding Company Pte. Ltd.) Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
168	N/A	2020.10.02	tweet from @stablekwn "@terra_money payments is avail on every street corner in Korea in more than 16k store locations through CU..."	FRE 403: Prejudice
169	N/A		Timeline of Chai Evidence	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication; FRE 1006: Improper Summary
171	N/A	2023.12.19	2023.12.19 Terra Luna Classic Historical Data _ CoinGecko	FRE 401: Relevance; FRE 403: Prejudice
172	N/A	2023.12.28	TerraClassic UST Historical Data CoinGecko	FRE 401: Relevance; FRE 403: Prejudice
173	N/A	2022.05.01	CoinGecko webpage Terra Luna Classic (formerly LUNA) marketcap May 2022	FRE 401: Relevance; FRE 403: Prejudice
174	N/A	2023.07.10	Certification of Translation Accuracy by Latitude Prime certifying the accuracy of the translation of documents Bates-labeled HASHEDINC0003975 and HASHEDINC0004103-6.	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
175	SEC-SEC-E-0002317	2023.05.22	Declaration made by Frank Castellucci on behalf of Accomplice Management, LLC Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
176	SEC-SEC-E-0002311	2023.05.08	Declaration made by Heather Harde on behalf of Arrington XRP Capital Fund, L.P. Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
177	SEC-ACFT-E-0000001	2023.11.05	Declaration made by Judith Louis on behalf of Aux Cayes FinTech Co. Ltd. Certifying Business Records.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
178	SEC-SEC-E-0002308	2023.05.05	Declaration made by - Radames V. Darby on behalf of Coinbase, Inc. Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
179	SEC-KFSC-E-0000343	2023.07.24	Declaration made by Jiyun Kim on behalf of DSRV Labs Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
180	SEC-EMAILS-E-0018487 - 88	2023.04.24	Declaration made by Andrew Siegel on behalf of Galaxy Digital, Inc. Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
181	SEC-SEC-E-0002331	2023.05.05	Declaration made by Karim Fattal on behalf of HOF Capital Management, LLC Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
182	SEC-EMAILS-E-0019297 - 98	2023.04.21	Declaration made by Ruby Sekhon on behalf of Polychain Capital, LP Certifying Records of Regularly Conducted Business Activity.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
183	SEC-MAS-E-000059 - 71	Various	declarations made by Chris Amani on behalf of Terraform Labs Pte. Ltd. Certifying Records of Foreign Official Records.	No Objection
184	N/A	2023.08.25	Declaration made by Matthew Hinerfeld on behalf of Jump Trading Group certifying the authenticity of records produced to the SEC.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
185	N/A	2024.02.28	Declaration made by Matthew Hinerfeld on behalf of Jump Trading Group certifying the authenticity of records produced to the SEC.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
186	SEC-BINANCEH-E-0000041	2023.07.12	Declaration made by Binance Case Team on behalf of Binance Certifying Records of Regularly Conducted Business Activity	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
187	SEC-SEC-E-0002326-27	2023.05.11	Declaration made by Maxi Mendoza on behalf of Deel, Inc. Certifying Records of Regularly Conducted Business Activity	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
188	SEC-SEC-E-0002309	2023.05.05	Declaration made by Catherine Widgor on behalf of Gemini Trust Company, LLC Certifying Records of Regularly Conducted Business Activity	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay



189	SEC-SEC-E-0002318	2023.05.10	Declaration made by Katrina Paglia on behalf of Pantera Capital Management LP Certifying Records of Regularly Conducted Business Activity	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
190	SEC-EMAILS-E-0019312	2023.04.20	Declaration made by Maxwell Rich on behalf of Republic Capital Adviser LLC Certifying Records of Regularly Conducted Business Activity	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
191	SEC-SEC-E-0002332	2023.05.15	Declaration made by Matthew Tolve on behalf of Tribe Capital Management Certifying Records of Regularly Conducted Business Activity	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
192	N/A		Price of LUNA during the period from May 19, 2021 to May 28, 2021.	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
193	N/A		Price of UST during the period from May 19, 2021 to May 28, 2021.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
194	N/A		Net swaps of UST into LUNA during the period from May 21, 2021 to May 27, 2021 from Terra Blockchain.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
195	N/A		Swap fees in percent for LUNA and UST swaps during May 23, 2021 in one-minute intervals.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
196	N/A		Swap fees in percent for UST into LUNA swaps for the during the period from May 21, 2021 to May 29, 2021.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
197	N/A		Jump Trading's half hourly net purchases of UST on May 23, 2021.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
198	N/A		Summary of LUNA received by Jump Trading from Terraform Labs, transfers of LUNA to exchanges and trading volume of LUNA during the period from January 14, 2020 to May 11, 2022.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
199	N/A		Chart of Jump Trading's daily cumulative and net USDT-UST positions during the period May 1, 2021 to May 31, 2021.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
200	N/A		Chart of Jump Trading's net purchases of UST during 14:30 to 15:00 GMT on May 23, 2021.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
201	N/A		Chart of the price of UST compared to Jump Trading and Non-Jump trading of USDT-UST on May 23, 2021.	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
203	N/A		Summary Graph showing number of commits to LP Server GitHub repository over time. (Sources: Edman Report, Exs. 20-22 ("LP Server Repository Commit History").)	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
205	N/A		Summary Graph showing volume of LP Server transactions on the Terra blockchain over time. (Sources: Edman Report, Ex. 74 ("LP Server MsgMultiSend Transactions"), Ex. 75 ("Terra Blockchain Transaction & Message Counts").)	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
206	N/A		Summary Graph showing volume of LP Server transactions compared to all MsgSend and MsgMultiSend transactions on the Terra blockchain over time. (Sources: Edman Report, Ex. 74 ("LP Server MsgMultiSend Transactions"), Ex. 75 ("Terra Blockchain Transaction & Message Counts").)	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
207	N/A		Summary Graph showing gaps in LP Server transactions over time. (Sources: Edman Report, Ex. 74 ("LP Server MsgMultiSend Transactions"), Ex. 75 ("Terra Blockchain Transaction & Message Counts").)	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
209	N/A		Summary Graph showing volume of LP Server transactions involving Chai merchant addresses over time. (Sources: Edman Report, Ex. 74 ("LP Server MsgMultiSend Transactions"), Ex. 80 ("Chai Merchant Addresses").)	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
215	LIGHTSPEED0000001-29	2021.06.XX	Luna TSA Lightspeed	No Objection
216	N/A	2021.01.XX	Coingecko webpage TerraClassicUSD (formerly UST) marketcap January 2021	FRE 401: Relevance; FRE 403: Prejudice
217	N/A	2021.06.01	Coingecko webpage TerraClassicUSD (formerly UST) marketcap June 2021	FRE 401: Relevance; FRE 403: Prejudice
218	N/A	2021.06.01	Coingecko webpage Terra Luna Classic (formerly LUNA) marketcap June 2021	FRE 401: Relevance; FRE 403: Prejudice

219	N/A	2021.08.XX	Coingecko webpage TerraClassicUSD (formerly UST) marketcap August 2021	FRE 401: Relevance; FRE 403: Prejudice
220	N/A	2022.02.XX	Coingecko webpage TerraClassicUSD (formerly UST) marketcap Feb 2022	FRE 401: Relevance; FRE 403: Prejudice
221	N/A	2022.05.01	Coingecko webpage TerraClassicUS (formerly UST) marketcap May 2022	FRE 401: Relevance; FRE 403: Prejudice
222	N/A	2022.05.30	Coingecko webpage Terra Luna Classic (formerly LUNA) showing price of LUNA from May 7, 2019 through May 30, 2022	FRE 401: Relevance; FRE 403: Prejudice
223	N/A	2019.12.30	Medium.com post "Terra 2019 - Year in Review"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
224	N/A	2020.08.02	Medium.com post "July 2020 Community Update"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
225	N/A	2021.03.17	Medium.com post "Anchor Protocol Launches as the Benchmark Rate of DeFi"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
226	N/A	2022.02.22	Luna Foundation Guard (@lfg_org) tweet "#LFG"	No Objection
227	TFL_SEC_00159407-09	2020.04.14	Email Do Kwon re: employee chart	No Objection
228	SEC-CurranB-E-0025274-6	2021.12.15	chat "Terra x Blocknative"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
229	TFL_SEC_00252744-51	2022.04.22	Statement of Work for Anchor Protocol Terraform Labs	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
230	TFL_00002488	2022.03.17	TFL Employee List	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
231	TFL_SEC_00300915-30	2019.04.XX	Whitepaper "Terra Money: Stability and Adoption"	No Objection
232	TFL_SEC_00299417-18	2021.12.06	Email Jeff Kuan, BC, to investment@terra.money	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
233	LIGHTSPEED0000248-51	2021.07.15	Email Brian Curran to Rachel Manson	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
234	SEC-JUMPTRADE-E-0000059-66	2019.11.19	Master Digital Currency Loan Agreement Tai Mo Shan Limited and Terraform Labs PTE LTD - 30M LUNA	No Objection
235	SEC-MAS-E-0001142-201	2020.02.06	Chai Subscription and Shareholders' Agreement - Do Kwon founder & shareholder	FRE 401: Relevance; FRE 403: Prejudice
236a	TFL_SEC_00225089-90	2022.05.18	IR Chai Finance email to Do Kwon	FRE 401: Relevance; FRE 403: Prejudice
236b	TFL_SEC_00225091	2022.05.18	IR Chai Finance email to Do Kwon - attachment 1 - Chai SG Kwon resignation	FRE 401: Relevance; FRE 403: Prejudice
236c	TFL_SEC_00225092	2022.05.18	IR Chai Finance email to Do Kwon - attachment 2 - Chai Holder Kwon resignation	FRE 401: Relevance; FRE 403: Prejudice
237a	TFL_SEC_00227368	2019.07.15	email from Jake Chang to Do Kwon	FRE 106: Rule of Completeness; FRE 403: Prejudice
237b	TFL_SEC_00227368	2019.07.15	certified translation of an email from Jake Chang to Do Kwon	No Objection
237c	TFL_SEC_00227369-73	2019.07.15	email from Jake Chang to Do Kwon - Attachment 2019.07.07 document titled "Q3 2019 Quarterly Check in"	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay
238	TFL_SEC_00214523-24	2019.11.27	conversation titled "mpdmnick-nicolas-cj-jake-1"	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice
239	SEC-MAS-E-0001301-07	N/A	Chai "Investor FAQ" version 200807	FRE 403: Prejudice; FRE 802: Hearsay
240a	HASHEDINC0004103-06	2022.05.25	email from Chai Investor Relations to others	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
240b	HASHEDINC0004103-06	2022.05.25	certified translation of an email from Chai Investor Relations to others	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication; Transcript—not evidence
241a	HASHEDINC0003975	2022.06.13	email from Chai Investor Relations to others	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
241b	HASHEDINC0003975	2022.06.13	certified translation of an email from Chai Investor Relations to others	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; Transcript—not evidence
242	N/A	2022.06.06	copy of a browser translation of the webpage <a href="https://chai.finance/index.html">https://chai.finance/index.html</a>	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication; Transcript—not evidence
243a	SEC-MAS-E-0001336-38	2022.05.30	email from Chai Investor Relations to others	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
243b	SEC-MAS-E-0001336-38	2022.05.30	certified translation of an email from Chai Investor Relations to others	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; Transcript—not evidence
243c	N/A	2023.10.09	Certification of Translation Accuracy by Latitude Prime certifying the accuracy of the translation of a document Bates-labeled SEC-MAS-E-0001336-8.	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
244a	TFL_SEC_00237481-88	2018.10.15	document titled "New name for TerraX, 10/15 Meeting Notes"	FRE 403: Prejudice; FRE 701: Opinion Testimony by Non-Expert; FRE 802: Hearsay

244b	TFL_SEC_00237481-88	2018.10.15	Certified translation document titled "New name for TerraX, 10/15 Meeting Notes"	FRE 401: Relevance; FRE 403: Prejudice; FRE 701: Opinion Testimony by Non-Expert; FRE 802: Hearsay; Transcript--not evidence
244c	N/A	2023.08.22	Certification of Translation Accuracy by Latitude Prime certifying the accuracy of the translation of a document Bates-labeled TFL_SEC_00237481-8.	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
245a	TFL_SEC_00222092-94	2019.07.15	email from Do Kwon to Ophelia Cai dated July 15, 2019	FRE 403: Prejudice
245b	TFL_SEC_00222092-2 (sic).	2019.07.15	Certified translation email from Do Kwon to Ophelia Cai dated July 15, 2019	FRE 401: Relevance; FRE 403: Prejudice; Transcript--not evidence
246a	TFL_SEC_00269426-28	2020.01.11	DS, KJ Lee, DK slack chat re: "bd-gr"	FRE 403: Prejudice; FRE 701: Opinion Testimony by Non-Expert; FRE 802: Hearsay
246b	TFL_SEC_00269426-28	2020.01.11	Certified translation of slack chat re: "bd-gr"	FRE 401: Relevance; FRE 403: Prejudice; FRE 701: Opinion Testimony by Non-Expert; FRE 802: Hearsay; Transcript--not evidence
246c	N/A	2023.09.29	Certification of Translation Accuracy by Latitude Prime certifying the accuracy of the translation of a document Bates-labeled TFL_SEC_00269426-8.	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
247	TFL_SEC_00214296-303	2020.05.01	conversation between Daniel Hwang and Paul Kim	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay
248	TFL_SEC_00239176-85	2020.05.25	conversation between Daniel Hwang and Paul Kim -	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
249	TFL_SEC_00214047-48.	2021.01.15	conversation between Brian Curran and Do Kwon	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
250	TFL_SEC_00213934-35	2022.04.05	conversation between Brian Curran and Sam Nofzinger	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
251	TFL_SEC_00207675-82	2019.10.10	email DK to Blockchain	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay
252	HOF 00000806-808	2019.11.28	email from Gigi Kwon to Terra Investor Relations	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice
253	TFL_SEC_00225049-53	2020.11.20	email from Kili Wall to Brady Dale	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice
254	TFL_EMP_00055742-43	2020.09.21	conversation titled "Terra < Zengo Integration Working Group"	FRE 106: Rule of Completeness; FRE 403: Prejudice
255	POLY10006355-60	2019.06.22	DK chat on Discord to jack@polychain.capital	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay
256	TFL_SEC_00213235-37	2021.10.03	document titled "Chai Integration (KMS & Security model)"	FRE 106: Rule of Completeness; FRE 401: Relevance; FRE 403: Prejudice
257	TFL_EMP_00051279-82	2020.10.09	conversation between Sarah K and Will Chen	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 901: Authentication
258a	JUMP0024348	2021.05.23	screenshot of captured from the video taken of communications with Do Kwon on May 23, 2021, as reflected on the phone of Kanav Kariya	FRE 403: Prejudice; FRE 106: Rule of Completeness; FRE 901; Authentication
258b	JUMP0024348	2021.05.23	video of communications with Do Kwon, as reflected on the phone of Kanav Kariya	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
259	SEC-JUMPTRADE-E-0001325-27	2021.07.07	email from Do Kwon to Kanav Kariya	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
260	N/A	2022.03.07	wayback machine capture of the market cap of tokens in the Terra ecosystem	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
261	SEC-JUMPTRADE-E-0000002-03	2021.07.22	Jump Amendment	No Objection
262	SEC-JUMPTRADE-E-0001774-76	2021.09.09	Email chain with Jump	FRE 401: Relevance; FRE 403: Prejudice
263	SEC-JUMPTRADE-E-0001960-66	2021.10.21	Email chain with Jump	FRE 401: Relevance; FRE 403: Prejudice
264	SEC-Gemini-E-0000031-35	2021.12.23	Gemini Customer certification form - Tai Mo Shan Ltd	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
265	SEC-FTXTRADING-E-0000172	2020.02.04	Tai Mo Shan Ltd Written Resolutions - appt of directors	FRE 401: Relevance; FRE 403: Prejudice
266	N/A	N/A	Printout of Kanav Kariya LinkedIn page	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
267a	TFL_SEC_00248418-19	2019.06.04	FWD email from Paul Kim to young@terra.money re: Naver Cloud platform ECF 125-53	No Objection
267b	TFL_SEC_00248418-19		translation	No Objection
267c	N/A		Translation Certification	No Objection
268a	TFL_SEC_00248411	2018.10.15	Email from Amy Ko to Paul Kim/CJ/Alex Kim re: corporate card payments	No Objection
268b	TF_SEC_00248411		translation	No Objection
268c	N/A		Translation Certification	No Objection
269	POLY10013656-58	2019.07.26	email from Do Kwon to Terra Investor Relations re: July Investor Update - KRW LUNA listing	No Objection



270	HOF00008627-31	2019.09.23	email from Do Kwon to Terra Team re: August/September Investor Update - NOW tied to staking rewards, listing	No Objection
271	N/A	2019.11.28	Medium.com post "November 2019 Terra Community Update"	No Objection
272	N/A	2020.02.06	Medium.com post "January 2020 Community Update" author Kwon	FRE 403: Prejudice
273	N/A	2020.03.04	Medium.com post "February 2020 Terra Community Update" author Kwon	No Objection
274	AXRP0012150-52	2020.06.01	Email from Hwang to Terra Investor Relations re: Terra May Investor Update	No Objection
275	N/A	2020.06.28	Medium.com post "June 2020 Community Update" author Sarah Kim	No Objection
276	N/A	2020.12.02	Medium.com post "November 2020 Community Update" author Sarah Kim	No Objection
277	N/A	2020.12.30	tweet from @stablekwn "Bow before the king"	FRE 401: Relevance; FRE 403: Prejudice
278	TFL_SEC_00297283-85	2021.03.29	PK chat msgs re: deploying Vault on Tequila and using Consul	No Objection
280	N/A		Timeline of LUNA-UST Evidence	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication; FRE 1006: Improper Summary
281	TFL_SEC_00166395-97	2019.11.15	Email Do Kwon to Tak Fujishima	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
282	AXRP0011544	2020.01.13	Email Do Kwon to Terra Investor Relations	No Objection
283	SEC-JUMPTRADE-E-0001502	2020.01.13	Email Do Kwon to Kanav Kariya	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
284	SEC-JUMPTRADE-E-0001531-35	2020.09.02	Email Tak Fujishima to CJ Han	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
285	SEC-JUMPTRADE-E-0001657-58	2020.09.06	Email CJ Han to Do Kwon	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
286	SEC-JUMPTRADE-E-0013783-85	2021.06.21	Email Anthony Ramirez - Jump reporting	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
287	SEC-JUMPTRADE-E-0002300	2020.12.10	Email Do Kwon to Kanav Kariya re: MIR	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
288	SEC-JUMPTRADE-E-0002326-27	2020.12.11	Email CJ Han to Chris Drew re: MIR	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
289	JUMP0003931-43	2021.11.02	Email from Will Nawrocki re: receipt of LUNA	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
290	TFL_0009450		spreadsheet of discord chats	No Objection
291	N/A	2019.04.16	"Countdown to Terra Mainnet Launch"	No Objection
292	N/A	2023.09.06	Wayback machine capture "Seoul-based payment tech startup CHAI gets \$60 million from Hanhwa, Softbank Ventures Asia"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay;
293	POLY10019591-616		Chai - "A disruptive payment solution for an exploding Asian eCommerce market"	No Objection
294	N/A	2019.06.11	discord chat Wintee and dokwon	No Objection
295	N/A	2019.07.26	discord chat dokwon terra update	No Objection
296	SEC-GITHUB-E-0000300		commit history LP Server Git Repository - master gitlog	No Objection
297	SEC-GITHUB-E-0000300		Github license	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
298	SEC-GITHUB-E-0000300		Github readme	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
299	TFL_SEC_00238660-68	2019.06.11	chat Alex Kim Paul Kim	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
300	N/A		Terra Finder - Seed Funding for the LP node	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
301	TFL_SEC_00242122		PW protected excel file - xfer from terraform labs to LP wallet	FRE 403: Prejudice; FRE 802: Hearsay; FRE 1006: Improper Summary
302	N/A		discord chat - dokwon "transactions from Chai..."	No Objection
303	N/A		discord chat chai transactions Block 7000	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
304	N/A		discord chat chai transactions Block 7004	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
305	N/A		discord chat chai transactions Block 7008	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
306	N/A		discord chat chai transactions Block 7013	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication

307	N/A		terra finder - chai transactions Block 7000	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
308	N/A		terra finder - chai transactions Block 7004	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
309	N/A		terra finder - chai transactions Block 7008	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
310	N/A		terra finder - chai transactions Block 7013	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
311	N/A		chai transactions created by LP server	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
312	N/A		LP servicer transaction and message counts	No Objection
313	N/A		LP wallet transfers to TFL addresses	FRE 403: Prejudice; FRE 1006: Improper Summary
314	SEC-KFSC-E-0000377		ChaiScan	No Objection
315	N/A		Chai Merchant addresses spreadsheet	No Objection
316	N/A		Unny KRT Transfers	FRE 403: Prejudice; FRE 1006: Improper Summary
317	TFL_SEC_00261457		spreadsheet from TFL re: vesting schedule	FRE 401: Relevance; FRE 403: Prejudice
318	N/A		Terra Finder - Ghost	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
319	N/A		Terra Finder - Wraith	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
320	N/A	2020.10.08	tweet from @terra_money re: Goliath/Marine spin down	FRE 401: Relevance; FRE 403: Prejudice
321	TFL_SEC_00239164	2020.01.05	Chat - alex kim and paul kim	FRE 401: Relevance; FRE 403: Prejudice
322	N/A	2021.08.10	Medium.com post "Anchor Community Update - July 2021"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
323	N/A	2023.08.14	Defendants' Answer	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
324	N/A	2023.09.22	Defendants' Second Amended Responses and Objections to Plaintiff's First Set of Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
325	N/A	2023.08.04	Defendants' Second Amended Responses and Objections to Plaintiff's Second Set of Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
326	N/A	2023.09.08	Defendant Kwon's Second Amended Responses and Objections to Plaintiff's Second Set of Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
327	N/A	2023.09.08	Defendant Kwon's Second Amended Responses and Objections to Plaintiff's First Set of Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
328	N/A	2023.10.20	Defendant Kwon Do Hyeong's Objections and Responses to Plaintiff's First Set of Requests for Admission to Defendant	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
329	N/A	2023.10.20	Terraform Labs Pte. Ltd.'s Objections and Responses to Plaintiff's First Set of Requests for Admission to Defendant	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
330	N/A	2023.10.06	Terraform Labs Limited Responses to SEC's Subpoena	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
331	N/A	2023.04.26	Defendants' Objections to Plaintiff's First Set of Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
332	N/A	2023.04.26	Defendants' Objections to Plaintiff's Second Set of Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
333	N/A	2023.04.26	Defendants' Responses to Plaintiff's First Set of Requests for Production	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
334	N/A	2023.05.13	TFL Amended Responses to First Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
335	N/A	2023.05.12	TFL Amended Responses to Second Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
336	N/A	2023.08.04	TFL's Second Amended Responses to First Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
337	N/A	2023.08.04	TFL's Second Amended Responses to Second Interrogatories	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
338	N/A	2023.08.23	Defendants' Responses to Plaintiff's Second Set of Requests for Production	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
339	N/A	2023.10.05	Do Kwon Third Amended Responses to SEC Interrogatories 5,10	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
340	N/A	2023.10.05	TFL's Third Amended Response to SEC Interrogatory No. 10	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
341	N/A	2023.10.13	Defendants' Responses to SEC's 4th Set of RFPs	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
342	N/A	2021.07.01	tweet from @stablekwn "I don't debate the poor on Twitter..."	FRE 401: Relevance; FRE 403: Prejudice; FRE 404: Improper Character Evidence; FRE 901: Authentication
343	N/A	2021.08.11	Do Kwon (@stablekwn) tweet re: \$Luna	FRE 401: Relevance; FRE 403: Prejudice
344	HOF00000355-69	2018.10.09	Nick @ terra.money whitepaper "Luna Valuation Model" - Luna is equity	No Objection
345	N/A	2021.04.07	Do Kwon (@stablekwn) tweet	No Objection

346	N/A	2021.04.18	Medium.com post "Terraform Labs (LUNA) - Telegram AMA - March 15"	FRE 401: Relevance; FRE 403: Prejudice
347	N/A	2021.04.07	Do Kwon (@stablekwn) tweet re: \$Luna	FRE 401: Relevance; FRE 403: Prejudice
348	HASHEDINC0002980-3006	N/A	presentation "Terra, A blockchain payment network, Now powering a \$40bn+ Pan-Asian eCommerce alliance"	FRE 403: Prejudice; FRE 901: Authentication
349	HOF00002986-88	2020.09.02	Email Daniel Hwang to Terra Investor Relations	No Objection
350	N/A	2019.09.23	Medium.com post "September 2019 Terra Community Update"	No Objection
351	N/A	2020.08.19	Terra (@terra_money) tweet - \$Luna listed on Binance	FRE 401: Relevance; FRE 403: Prejudice
352	N/A	2021.01.05	Medium.com post "December 2020 Community Update"	No Objection
353	N/A	2022.05.09	Do Kwon (@stablekwn) tweet - deploying more capital	FRE 401: Relevance; FRE 403: Prejudice
354	N/A	2022.05.10	Do Kwon (@stablekwn) tweet - close to recovery	FRE 401: Relevance; FRE 403: Prejudice
355	ACCMGMT00000596-98	2021.06.04	Email Jeff Kuan to investment@terra.money	No Objection
356	SEC-JUMPTRADE-E-0002344-48	2021.05.06	Email Chris Drew to CJ Han re: MIR	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
357	HASHEDINC0002615-18	2019.06.25	Email Kwon to Shin sub: Terra June 2019 Investor Update	FRE 403: Prejudice; FRE 901: Authentication
358	SEC-JUMPTRADE-E-0001029-30	2021.02.09	Jump email re: LUNA trading	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
359	N/A	2021.05.23	CoinmarketCap UST chart	No Objection
360	JUMP0000550-65	2022.03.18	Kwon/Kariya Signal Chat	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
361	SEC-EMAILS-E-0010047-53	2022.08.26	Jump profits letter	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
362	N/A	2023.09.19	Corrected Expert Report of Dr. Matthew J. Edman -	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
363	N/A	2023.04.XX	cv 2023-04_mizrach	FRE 401: Relevance; FRE 403: Prejudice
364	N/A	2023.09.07	Expert Report of Dr. Bruce Mizrach	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
365	N/A	2023.10.13	Mizrach Rebuttal Expert Report	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication
366	N/A	2023.10.13	Rebuttal Report of Dr. Matthew Edman - 2023.10.13	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge
367	N/A	2021.10.18	Medium.com post "What's new in the Terra Ecosystem with Do Kwon, CEO of Terraform Labs"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
368	SEC-JUMPTRADE-E-0000039-54	2020.08.16	Master Loan Agreement	No Objection
369	SEC-KobreKim-E-0000004-05	No date	Contractor Agreement between Chen and Terraform Labs	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
370	TFL_EMP_00051393-95	2020.11.20	Telegram communication between Chen and Sarah Kim	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
371	TFL_EMP_00051269-71	2021.06.07	Telegram communication between Chen and Sarah Kim	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
372	TFL_EMP_00057074-78	2020.10.27	Telegram communication	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
373	TFL_EMP_00057079-82	2020.10.27	Attachment to Ex. 6 titled CHAI KRT Top-Up Integration Specification	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
374	TFL_SEC_00214266-69	2020.10.08	Telegram Communication	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
375	TFL_EMP_00008663-79	2021.09.01	Telegram Communication between Chen and SJ Park	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
376	TFL_EMP_00051357-60	2021.05.28	Telegram Communication between Chen and Tiger S	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
377	TFL_EMP_00054872-78	2021.07.08	Telegram Communication between Chen and SJ Park	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
378	TFL_EMP_00052530-34	2021.05.18	Telegram Communication between Chen and Do Kwon	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
379a	SEC-CurranB-E-0029323	2020.12.20	Email chain from Curran to Bonny Lee	No Objection
379b	SEC-CurranB-E-0029197-205	2020.12.03	Employment Agreement	No Objection
380	TFL_SEC_00238356-58	2021.05.24	Slack msg between Curran and Yun	FRE 403: Prejudice; FRE 802: Hearsay
381	N/A	2021.05.24	Medium.com post "LUNA Black Swan: Terra's Do Kwon gives AMA on What We've Learned & Anchor Action Plan	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 701: Opinion Testimony by Non-Expert; FRE 901: Authentication
382	ACCMGMT00000599-601	2021.06.04	document: "Terraform Labs Investor Update, May 2021"	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 901: Authentication
383	TFL_SEC_00183723-32	2022.04.18	email chain from Curran to Osipovich	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay



384	TFL_0010078-93	N/A	PPT: "Mirror Protocol: assets reflected on the blockchain"	FRE 401: Relevance; FRE 403: Prejudice
385	ACCMGMT00000624-26	2021.07.08	Terraform Labs Investor Update, June 2021	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 901: Authentication
386	JUMP0047778-79	2021.05.14	Email from DiSomman to Team Illini re: Jump Illini Nation	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
387	JUMP0041447-511	2021.05.01	email Disomman to Team Illini re Capital Risk Profile Estimate	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
388	JUMP0087963-66	2021.07.26	email fro Kariya to DiSomman and others re: IEO Liquidation PNL Report	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
389	N/A	2023.09.28	Expert Report of Terrence Hendershott	No Objection
390	N/A	2008.04.26	Working Paper: "Does Algorithmic Trading Improve Liquidity"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
391	N/A	2015.04.17	Declaration of Dr. Hendershott in CFTC v. Nav Sarao Futures	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
392	TFL_SEC_00173218	2019.11.07	Han to Kwon fwd (jump) proposal for Terra partnership	FRE 403: Prejudice; FRE 802: Hearsay
393	TFL_SEC_00173215-16	2019.11.10	Email Kwon to Tak acceptance of partnership	FRE 403: Prejudice; FRE 802: Hearsay
394	SEC-JUMPTRADE-E-0004325-26	2020.08.14	Email CJ to Kwon cc Kariya re UST and KRT Loan agreement	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
395a	SEC-JUMPTRADE-E-0000964-70	2021.03.29	Email from Kariya to Kwon/CJ re Loan confirm tranche amendment	FRE 106: Rule of Completeness; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
395b	SEC-JUMPTRADE-E-0000965-70	2021.03.29	Email from Kariya to Kwon/CJ re Loan confirm tranche amendment - Attachment LUNA Terra Loan Confirmation Amended and Restated March 29 2021	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
396	JUMP0005186-88	2022.01.06	Email from Kariya to Goldich re: Luna Foundation Guard LTD member	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
397	POLY10005941-44	2021.03.29	Email from Kuan	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
398	TFL_SEC_00162260-62	2021.09.14	Email from Curran to Kuan	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
399	TFL_SEC_00225016-20	2020.10.29	Email from Kuan to Zajko	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
400	ACCMGMT00003921-26	2021.05.31	Email from Do Kwon to Kuan	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
401	HO-14164-JK_09029	2021.01.01	Short message report	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
402	HO-14164-JK_09977-88	2021.01.12	Short message report	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
403	ACCMGMT00008998-9001	2021.04.16	Email from Ian Rogers to Kuan	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
404	HO-14164-JK_05412-15	2021.05.21	Short message report	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
405	HO-14164-JK_06426-27	2021.06.16	Short message report	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
406	TFL_SEC_00238438-41	2021.05.23	Short message report	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
407	TFL_SEC_00240195-96	2021.05.23	Short message report	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
408	TFL_SEC_00237650-51	2021.05.23	Short message report	FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
409	TFL_EMP_00002184	2022.04.21	Short message report	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
410	TFL_EMP_00020357-62	2022.06.15	List of msgs in chronological order	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 1006: Improper Summary
411	N/A	2021.02.14	tweet from @stablekwn re: @chamath speaking about terra money	FRE 401: Relevance; FRE 403: Prejudice
412	N/A	2021.03.25	Medium.com post "March 2021 Community Update" author Sarah Kim	FRE 401: Relevance; FRE 403: Prejudice
413	BHL-SEC-MIRROR-00000002		Binance Order book data	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
414	SEC-CORR-E-0000150		Binance Order book data	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
415	HOF00002179-211	2018.04.23	Constitution of Terraform Labs Pte. Ltd.	FRE 401: Relevance; FRE 403: Prejudice
416	TFL_0002479	2022.01.12	Terraform Labs Pte. Ltd. Organization Chart	FRE 401: Relevance; FRE 403: Prejudice
417	TFL_SEC_00178984-94	2020.06.XX	Whitepaper "Anchor: Gold Standard for Passive Income on the Blockchain"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
418	POLY10013202-20	2018.03.19	Whitepaper "Terra: A price-stable and democratic money-as-protocol"	No Objection
419a	AXRP0011209	2019.05.21	Email - Do Kwon to Terra Investor Relations	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
419b	AXRP0011210-31	2019.05.21	Email ATT - Do Kwon to Terra Investor Relations "Terra Money: Stability Stress Test"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
420	N/A	2019.02.22	Medium.com post "Introducing the new Terra Protocol"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
421	N/A	2019.05.22	Medium.com post "May 2019 Terra Community Update"	FRE 401: Relevance; FRE 403: Prejudice
422	N/A	2021.09.30	Medium.com post "Columbus-5 Launches - Welcome to the Future of Terra"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
423	HASHEDINC0002633-35	2019.04.11	Email Do Kwon to investors	FRE 403: Prejudice; FRE 802: Hearsay
424	N/A	2021.03.17	Do Kwon (@stablekwn) tweet - Anchor	FRE 401: Relevance; FRE 403: Prejudice

425	N/A	2022.02.18	Anchor Protocol (@anchor_protocol) rewtet of 2022.02.17 Do Kwon tweet	FRE 401: Relevance; FRE 403: Prejudice
426	ACCMGMT00000429-32	2021.03.28	Email Jeff Kuan, cc Brian Curran, to investment@terra.money	No Objection
427	TFL_0000701-02	2020.12.03	Email Do Kwon to Terra Investor Relations re: Mirror - you need to acquire UST - Kucoin is the most liquid exchange	FRE 401: Relevance; FRE 403: Prejudice
428	JUMP0002470-71	2021.07.21	Email Anthony Ramirez re: wormhole	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
429	HOF00003663-34	2018.12.10	Email Daniel Shin to Terra Team	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 403: Prejudice
430	SEC-FINMA-E-0000414-18	2021.12.08	IDNow Form Sheet Online Identification	FRE 401: Relevance; FRE 403: Prejudice
431	SEC-FINMA-E-0000163-66	2021.12.13	TFK Bizfile ACRA	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
432	SEC-FINMA-E-0000196-202	2021.12.22	Sygnum Access Authority	FRE 401: Relevance; FRE 403: Prejudice
433	TFL_SEC_A_00003174	2022.02.XX	Sygnum Account Feb 2022 Transactions USD	FRE 401: Relevance; FRE 403: Prejudice
434	TFL_SEC_A_00003179	2022.03.XX	Sygnum Account Mar 2022 transactions SGD	FRE 401: Relevance; FRE 403: Prejudice
435	TFL_SEC_A_00003178	2022.01.01-09.30	Sygnum Account Jan-Sept 2022 transactions CHF	FRE 401: Relevance; FRE 403: Prejudice
436	TFL_SEC_A_00003176	2022.01.01-09.30	Sygnum Account Jan-Sept 2022 transactions EUR	FRE 401: Relevance; FRE 403: Prejudice
437	TFL_SEC_A_00003168-69	2022.03.XX	Sygnum Account Mar 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
438	TFL_SEC_A_00003164-65	2022.04.XX	Sygnum Account Apr 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
439	TFL_SEC_A_00003172-73	2022.05.XX	Sygnum Account May 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
440	TFL_SEC_A_00003180	2022.06.XX	Sygnum Account Jun 2022 transactions SGD	FRE 401: Relevance; FRE 403: Prejudice
441	TFL_SEC_A_00003166-67	2022.06.XX	Sygnum Account Jun 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
442	TFL_SEC_A_00003153-54	2022.07.XX	Sygnum Account Jul 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
443	TFL_SEC_A_00003170-71	2022.08.XX	Sygnum Account Aug 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
444	TFL_SEC_A_00003186	2022.09.XX	Sygnum Account Sept 2022 transactions SGD	FRE 401: Relevance; FRE 403: Prejudice
445	TFL_SEC_A_00003158-59	2022.09.XX	Sygnum Account Sept 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
446	TFL_SEC_A_00003182-83	2022.10.XX	Sygnum Account Oct 2022 transactions SGD	FRE 401: Relevance; FRE 403: Prejudice
447	TFL_SEC_A_00003155-56	2022.10.XX	Sygnum Account Oct 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
448	TFL_SEC_A_00003184-85	2022.11.XX	Sygnum Account Nov 2022 transactions SGD	FRE 401: Relevance; FRE 403: Prejudice
449	TFL_SEC_A_00003157	2022.11.XX	Sygnum Account Nov 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
450	TFL_SEC_A_00003181	2022.12.XX	Sygnum Account Dec 2022 transactions SGD	FRE 401: Relevance; FRE 403: Prejudice
451	TFL_SEC_A_00003177	2022.12.XX-2023.03.XX	Sygnum Account Dec 2022 to Mar 2023 transactions CHF	FRE 401: Relevance; FRE 403: Prejudice
452	TFL_SEC_A_00003161-62	2022.12.XX	Sygnum Account Dec 2022 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
453	TFL_SEC_A_00003163	2023.01.XX	Sygnum Account Jan 2023 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
454	TFL_SEC_A_00003160	2023.02.XX	Sygnum Account Feb 2023 transactions USD	FRE 401: Relevance; FRE 403: Prejudice
455	TFL_SEC_A_00003175	2022.10.XX - 2023.03.XX	Sygnum Account Oct 2022 - Mar 2023 blank EUR	FRE 401: Relevance; FRE 403: Prejudice
456	JUMP00003970-82	2021.11.02	Email chain Nawrocki, Han, Johansen, Kariya, Nagy re LUNA delivery	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
457	SEC-FINMA-E-0000670-74	2022.06.20	Sygnum Financial Crime and Reputational Risk Report - Terraform Labs Pte Ltd	FRE 401: Relevance; FRE 403: Prejudice
458	SEC-FINMA-E-0003768	2022.04.13	Kernel Labs Invoice to Terraform Labs for software development/support \$448,668	FRE 401: Relevance; FRE 403: Prejudice
459	SEC-JUMPTRADE-E-0000004-08	2021.04.02	Amended and Restated Loan Confirmation - Terraform Labs Limited Tai Mo Shan Limited	No Objection

460	SEC-FINMA-E-0000337	2022.03.21 - 2022.09.26	Sygnum Account Position Statement CHF	FRE 401: Relevance; FRE 403: Prejudice
461	SEC-FINMA-E-0000338	2022.03.14 - 2022.10.31	Sygnum Account Position Statement EUR	FRE 401: Relevance; FRE 403: Prejudice
462	SEC-FINMA-E-0000339-45	2022.03.04 - 2022.10.31	Sygnum Account Position Statement SGD	FRE 401: Relevance; FRE 403: Prejudice
463	SEC-FINMA-E-0000346-80	2022.02.23 - 2022.10.31	Sygnum Account Position Statement USD	FRE 401: Relevance; FRE 403: Prejudice
464	TFL_SEC_00214296-303	2020.05.01	Chat Hwang Kim "btw, stakefish is interested"	FRE 401: Relevance; FRE 403: Prejudice
465	TFL_SEC_00220694	2020.02.18	Email from Kwon to terra people re: Formalizing Terra / Chai split	FRE 401: Relevance; FRE 403: Prejudice
466	TFL_SEC_00298088-100	2021.11.14	Services Agreement between Terraform Labs PTE, LTD and Gaza Labs Inc.	FRE 401: Relevance; FRE 403: Prejudice
467	SEC-FINMA-E-0000189-95	2022.06.01	Sygnum Declaration of Authority for E-Banking Access Terraform Labs Pte. Ltd. - Kwon and Lim authorized employees	FRE 401: Relevance; FRE 403: Prejudice
471	POLY10006402-04	2019.08.09	Email from discord notification bot to roman@polychain.capital re: "dokwon mentioned you in Terra Validators"	FRE 403: Prejudice; FRE 802: Hearsay
473	N/A	2022.11.25	Declaration made by Gino Wirthensohn and Stephan Zimmermann on behalf of Sygnum Bank AG Certifying Records of Regularly Conducted Business Activity, dated November 25, 2022.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
474	N/A	2022.12.14	Declaration made by Gino Wirthensohn and Stephan Zimmermann on behalf of Sygnum Bank AG Certifying Records of Regularly Conducted Business Activity, dated December 14, 2022.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
475	N/A	2023.04.05	Declaration made by Martin Burgherr and Stephan Zimmermann on behalf of Sygnum Bank AG Certifying Records of Regularly Conducted Business Activity, dated April 5, 2023.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
476	TFL_SEC_00160232	2018.12.31	CIMB Terraform Labs Bank Reconciliation Dec. 2018	FRE 401: Relevance; FRE 403: Prejudice
477	TFL_SEC_00222185-86	2019.05.XX	CIMB Terraform Labs Bank Statement May 2019	FRE 401: Relevance; FRE 403: Prejudice
478	TFL_SEC_00160284	2019.12.19	CIMB Terraform Labs Bank Reconciliation Dec. 2019	FRE 401: Relevance; FRE 403: Prejudice
479	TFL_SEC_00226337-38	2020.01.XX	CIMB Terraform Lab Bank Statement Jan 2020	FRE 401: Relevance; FRE 403: Prejudice
480	TFL_SEC_00226349-50	2020.02.XX	CIMB Terraform Lab Bank Statement Feb 2020	FRE 401: Relevance; FRE 403: Prejudice
481	TFL_SEC_00226363-65	2020.03.XX	CIMB Terraform Lab Bank Statement Mar 2020	FRE 401: Relevance; FRE 403: Prejudice
482	TFL_SEC_00226370-71	2020.04.XX	CIMB Terraform Lab Bank Statement Apr 2020	FRE 401: Relevance; FRE 403: Prejudice
483	TFL_SEC_00226376-79	2020.05.XX	CIMB Terraform Lab Bank Statement May 2020	FRE 401: Relevance; FRE 403: Prejudice
484	TFL_SEC_00226383-87	2020.06.XX	CIMB Terraform Lab Bank Statement Jun 2020	FRE 401: Relevance; FRE 403: Prejudice
485	TFL_SEC_00226393-96	2020.07.XX	CIMB Terraform Lab Bank Statement Jul 2020	FRE 401: Relevance; FRE 403: Prejudice
486	TFL_SEC_00226401-04	2020.08.XX	CIMB Terraform Lab Bank Statement Aug 2020	FRE 401: Relevance; FRE 403: Prejudice
487	TFL_SEC_00226409-11	2020.09.XX	CIMB Terraform Lab Bank Statement Sept 2020	FRE 401: Relevance; FRE 403: Prejudice
488	TFL_SEC_00226418-20	2020.10.XX	CIMB Terraform Lab Bank Statement Oct 2020	FRE 401: Relevance; FRE 403: Prejudice
489	TFL_SEC_00226421-23	2020.11.XX	CIMB Terraform Lab Bank Statement Nov 2020	FRE 401: Relevance; FRE 403: Prejudice
490	TFL_SEC_00174761-62	2020.11.10	Email Chain from Stacey Lim to Jean Lim re: Terraform Lab management accounts for October 2020	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
491	TFL_SEC_00226431-33	2020.12.XX	CIMB Terraform Lab Bank Statement Dec 2020	FRE 401: Relevance; FRE 403: Prejudice
492	TFL_SEC_00226339-42	2021.01.XX	CIMB Terraform Lab Bank Statement Jan 2021	FRE 401: Relevance; FRE 403: Prejudice
493	TFL_SEC_00226351-55	2021.02.XX	CIMB Terraform Lab Bank Statement Feb 2021	FRE 401: Relevance; FRE 403: Prejudice
494	TFL_SEC_00170533-40	2021.02.17	Email Chain from Stacey Lim to Jean Lim re: Terraform Lab management accounts for December 2020	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay

495	TFL_SEC_00170531	2021.02.23	Email from Stacey Lim to Rica Santos re: Terraform Labs Pte Ltd Management Accounts for December 2020	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
496	TFL_SEC_00226366-69	2021.03.XX	CIMB Terraform Lab Bank Statement Mar 2021	FRE 401: Relevance; FRE 403: Prejudice
497	TFL_SEC_00226372-75	2021.04.XX	CIMB Terraform Lab Bank Statement Apr 2021	FRE 401: Relevance; FRE 403: Prejudice
498	TFL_SEC_00226380-82	2021.05.XX	CIMB Terraform Lab Bank Statement May 2021	FRE 401: Relevance; FRE 403: Prejudice
499	TFL_SEC_00226388-92	2021.06.XX	CIMB Terraform Lab Bank Statement Jun 2021	FRE 401: Relevance; FRE 403: Prejudice
500	TFL_SEC_00226397-400	2021.07.XX	CIMB Terraform Lab Bank Statement Jul 2021	FRE 401: Relevance; FRE 403: Prejudice
501	TFL_SEC_00215839-42	2021.08.XX	CIMB Terraform Lab Bank Statement Aug 2021	FRE 401: Relevance; FRE 403: Prejudice
502	TFL_SEC_00215843-48	2021.09.XX	CIMB Terraform Lab Bank Statement Sept 2021	FRE 401: Relevance; FRE 403: Prejudice
503	TFL_SEC_00215849-53	2021.10.XX	CIMB Terraform Lab Bank Statement Oct 2021	FRE 401: Relevance; FRE 403: Prejudice
504	TFL_SEC_00215854-60	2021.11.XX	CIMB Terraform Lab Bank Statement Nov 2021	FRE 401: Relevance; FRE 403: Prejudice
505	TFL_SEC_00215861-66	2021.12.XX	CIMB Terraform Lab Bank Statement Dec 2021	FRE 401: Relevance; FRE 403: Prejudice
506	TFL_SEC_00215833-38	2022.01.XX	CIMB Terraform Lab Bank Statement Jan 2022	FRE 401: Relevance; FRE 403: Prejudice
507	TFL_SEC_00226356-62	2022.02.XX	CIMB Terraform Lab Bank Statement Feb 2022	FRE 401: Relevance; FRE 403: Prejudice
508	TFL_SEC_00215875-82	2022.01.25	Notarized Copy (singapore) of CIMB Bank Statement for Terraform Labs Dec 2021	FRE 401: Relevance; FRE 403: Prejudice
509	TFL_0009657-70	2020.12.10	Master Loan Agreement Terraform Labs PTE LTD and Tai Mo Shan Limited - 4 million MIR	No Objection
510	SEC-JUMPTRADE-E-0000057-58	2021.05.07	Loan Confirmation between Terraform Labs PTE LTD and Tai Mo Shan Limited 500,000 MIR	No Objection
511	N/A	2021.09.20-22	Youtube screencapture video with Do Kwon and slide "State of Terra, Do Kwon, Terraform Labs	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication; FRE 403: Prejudice
512	WASHINGTON NATIONAL S_SEC_0000001-14	2022.02.04	Sponsorship Agreement Nationals Guernsey Trust t/a Terra Community Trust	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 901: Authentication; FRE 403: Prejudice
513	N/A	2022.02.09	Medium.com post "Washington Nationals Join Forces with Terra Community DAO in a First-of-its-Kind Partnership"	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
514	N/A	2018.08.29	press release: "Terra Raises \$32M in Seed Funding to Build the Future of Digital Money"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
515	TFL_SEC_00264205-06	2018.05.24	Email Do Kwon to Wayne Shu	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
516a	N/A	2021.06.XX	transcript of SJ Park video "Powering the Innovation of Money & DeFi"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Transcript--not evidence
516b	N/A	2021.06.XX	SJ Park video "Powering the Innovation of Money & DeFi"	FRE 403: Prejudice; FRE 802: Hearsay
517	HOF00000554-72	N/A	Terra Investor Slides	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
518a	N/A	2021.09.21	Youtube webpage for video "LIVE FROM NEW YORK: TeFi Alpha 2021"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
518b	N/A	2021.09.21	transcript of video "LIVE FORM NEW YORK: TeFi Alpha 2021"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Transcript--not evidence
518c	N/A	2021.09.21	video of "LIVE FORM NEW YORK: TeFi Alpha 2021"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
519	N/A	2021.07.16	Medium.com post "Introducing the \$150 Million Terra Ecosystem Fund"	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
520	N/A	2022.01.19	Medium.com post "Formation of the Luna Foundation Guard (LFG)"	FRE 403: Prejudice; FRE 802: Hearsay
521	TFL_SEC_00270612-16	2022.01.20	Deed of Gift between Terraform BVI and LFG	No Objection
522	TFL_SEC_00244694-705	2022.01.10	Master Services Agreement between Terraform Labs PTE Ltd and LFG	FRE 401: Relevance; FRE 403: Prejudice
523	TFL_SEC_A_00109585-615	2018.11.15	Token Sale Agreement Terraform Labs Limited and Chris Lee - UST purchase	No Objection
524	HO-14164_JK_05412-15	2021.05.20	Conversation between Jeff Kuan and Matt Cantieri	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
525	TFL_SEC_00114523	2021.03.01	Do Kwon (@stablekwn) tweet - commercial suicide	FRE 401: Relevance; FRE 403: Prejudice
526	N/A	2021.04.06	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice
527	N/A	2021.04.23	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice
528	N/A	2021.05.27	Terra (@terra_money) tweet	FRE 401: Relevance; FRE 403: Prejudice



529	N/A	2021.05.11	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice
530	N/A	2021.10.07	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice
531	N/A	2021.04.20	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice
532	N/A	2022.01.27	Do Kwon (@stablekwon) tweet - subsidizing Anchor	FRE 401: Relevance; FRE 403: Prejudice
533	JUMP0006641-42	2022.02.10	Email Do Kwon to LFG re:funding Anchor	FRE 401: Relevance; FRE 403: Prejudice
534	ACCMGMT00000208-12	2020.11.16	Email Do Kwon re: Mirror	FRE 401: Relevance; FRE 403: Prejudice
535	ACCMGMT00000621-23	2021.07.08	Email Jeff Kuan to investment@terra.money	No Objection
536	HOF00000001-25	2018.07.19	Token Sale Agreement Terraform Labs Pte Ltd HOF	No Objection
537a	HOF00003787-93	2019.06.13	Capital GGI Fund Tokens LLC	No Objection
537b	HOF00003794-95	2019.06.13	Email/attachment to Hof Capital	No Objection
538a	LIGHTSPEED0000325-26	2021.11.02	Email/attachment to Hof Capital - attachment TSA Amendment (HOF)	No Objection
538b	LIGHTSPEED0000327-31	2021.11.02	Email/attachment Jeff Kuan to Natalie Luu - attachment Questions for Terraform Labs - LSVF LUNA Reinvestment pdf	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 901: Authentication
539	TFL_SEC_00226035-53	2020.03.12	Listing Services Agreement between Binance Holdings Ltd and Terraform Labs Pte. Ltd.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
540	TFL_SEC_00184935-52	2021.03.25	Bitfinex Listing Agreement between Terraform Labs Limited and BFXWW Inc.	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
541	COIN-HO_14164_0001692-707	2022.12.23	Letter from Coinbase, Inc. counsel to Kathleen Hitchins	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
542	N/A	2023.05.03	declaration for the website capture of a YouTube page <a href="https://www.youtube.com/watch?v=vKpKsoHGVow">https://www.youtube.com/watch?v=vKpKsoHGVow</a> showing a video of Do Kwon dated September 20-22, 2021.	FRE 403: Prejudice; FRE 802: Hearsay
543	N/A	2020.09.21	Medium.com post "Announcing TerraUSD (UST)—the Interchain Stablecoin"	No Objection
544	TFL_SEC_00237821	No date	spreadsheet reflecting TFL and LFG wallet addresses produced by defendants	No Objection
545	TFL_SEC_00160330	No date	LUNA Investors Spreadsheet produced by defendants	FRE 401: Relevance; FRE 403: Prejudice
546	TFL_SEC_00160303	2021.12.XX	December 2021 Reconciliation	FRE 401: Relevance; FRE 403: Prejudice
547	CB MIRROR_0000001-10	2020.10.16	Simple Agreement for Farmed Tokens Coinbase	FRE 401: Relevance; FRE 403: Prejudice
548	N/A	2022.11.09	audit report Luna Foundation Guard	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
549	TRIB00002579-82	2022.01.28	Email chain between Tribe and Defendants	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
550	TRIB0000002846-73	2022.01.21	Token Sale Agreement for Luna from Tribe	FRE 401: Relevance; FRE 403: Prejudice
551	Noon_SEC_Mirror_0000093-94	2020.10.05	Email chain from Mirror Investor A	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
552	TFL_0001006-07	2020.10.08	email Mirror Investor C	FRE 401: Relevance; FRE 403: Prejudice
553	TFL_0001088-89	2020.11.25	email chain between Mirror Investor D and Defendants	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
554	PANT-MIR-00005926-28	2020.04.29	Email chain Pantera Kwon Chai userbase	FRE 403: Prejudice; FRE 802: Hearsay
555	PANT-MIR-00010269-99	2020.06.XX	LUNA Token Sale Agreement Pantera	No Objection
556	PANT-MIR-00007315	2021.05.06	Email Veradittakit to Sarah Tavel re: connecting to Kwon	FRE 403: Prejudice; FRE 802: Hearsay
557	N/A	2021.04.08	VeradiVerdict - Issue #131 "Anchor Protocol"	FRE 403: Prejudice; FRE 802: Hearsay
558	POLY00000122-23	2019.06.14	Token Sale Agreement Supplemental Letter (Amendment)	No Objection
559a	POLY10006378-83	2019.06.24	Email chain between Tekin Salimi of Polychain and Shin/Kwon Terra regarding TSA Amendment	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
559b	POLY10006384-85	2019.06.24	Email chain between Tekin Salimi of Polychain and Shin/Kwon Terra regarding TSA Amendment - attachment TSA Amendment (Polychain) (6-13-19) pdf	FRE 403: Prejudice; FRE 901: Authentication
560	N/A	2019.05.24 to 2020.05.24	copy of Terra Finder webpage showing LUNA token distributions to Polychain clients	FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
561	POLY10080648-56	2020.02.24	Email chain between Polychain and Terra personnel re: user metrics and growth strategy	FRE 403: Prejudice; FRE 802: Hearsay

562	POLY00000001	No date	Spreadsheet of Polychain's advisory clients' sales of LUNA tokens on secondary mkt	FRE 403: Prejudice; FRE 802: Hearsay
563a	POLY10040342	2018.05.14	Email/attachment Shu to Ruju Terra whitepaper	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
563b	POLY10040343-63	2018.05.14	Email/attachment Shu to Ruju Terra whitepaper - attachment 1 terra_deck(05.10.2018) pdf	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
563c	POLY10040364-84	2018.05.14	Email/attachment Shu to Ruju Terra whitepaper - attachment 2 Terra White_paper08 pdf	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
564a	POLY10013092	2018.05.15	Email/attachment Kwon to Raju re conversation - Terra Deck/Whitepaper	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
564b	POLY10013093-114	2018.05.15	Email/attachment Kwon to Raju re conversation - Terra Deck/Whitepaper - Attachment 1 TERRA_DECK(04.30.2018) pdf	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
564c	POLY10013115-135	2018.05.15	Email/attachment Kwon to Raju re conversation - Terra Deck/Whitepaper - Attachment 2 Terra White_paper pdf	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
565	POLY10013177	2018.06.04	Invite to 2018.06.05 Meeting - Raju, Shin, Kwon, Shu, Zurrer	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
566	POLY1005715-19	2018.06.19 - 2018.07.11	Email chain re: negotiations of Luna Agreement terms	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
567	POLY10040612-14	2018.08.01	email chain re: Polychain bitcoin xfer	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
568	POLY10082569-70	2018.08.26	Investor update email sent by Shin	No Objection
569	POLY10082782	2018.08.03	investor update email sent by Kwon	FRE 401: Relevance; FRE 403: Prejudice
570	POLY10013410-11	2018.12.09	investor update email sent by Shin	No Objection
571	POLY10013412	2018.12.13	investor update email sent by Kwon	FRE 401: Relevance; FRE 403: Prejudice
572	N/A	2021.01.27	TokenPost Press Release	FRE 401: Relevance; FRE 403: Prejudice
573	N/A	2021.03.14	Kwon Tweet re: Anchor	FRE 401: Relevance; FRE 403: Prejudice
574	TFL_0009584-95	2021.06.15	Wintermute Agreement	FRE 401: Relevance; FRE 403: Prejudice
575	SEC-BIANCEH-E-0000006	2022.08.07	Binance Spreadsheet	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
576	N/A	No date	Kwon chat	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
577	Deel_SEC000632-45	2022.04.11	Employment Agreement	No Objection
578	TFL_EMP_00036813-14	2022.01.18	Chat titled "Blockchain.com TFL"	FRE 401: Relevance; FRE 403: Prejudice
579	TFL_EMP_00004775-78	2022.03.09	Chat titled "Terra by Blockworks"	FRE 401: Relevance; FRE 403: Prejudice
580	TFL_EMP_00019692-94	2022.03.15	Sponsorship contract between Blockworks and LFG	FRE 401: Relevance; FRE 403: Prejudice
581	TFL_SEC_00161804	2022.04.13	Email exchange between Brian Curran and Pooja Strotier, copied to Chris Amani and Zion Schum	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
582	TFL_EMP_000179487-89	2022.05.08	Chat between Amani and Do Kwon	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
583	N/A	2022.11.09	J.S. Held Report	FRE 401: Relevance; FRE 403: Prejudice; FRE 407: Subsequent Remedial Measures
584	N/A	2023.07.18	Terraform declaration FTX bankruptcy proceedings	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; Pleadings: not admissible
585	TFL_EMP_00052963	2021.05.12	Copies of text messages to William Shin from Brown	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
586	TFL_SEC_00253586-94	2021.06.10	Employment Agreement	No Objection
587	TFL_SEC_00213867-68	2019.12.15	chat re: on-chain KRT volume	No Objection
588	JUMP0006727-33	2022.02.11	email: From Justin Brill to Luu cc: various re: Terra < Jump - Feb. 7 meeting recap	FRE 403: Prejudice; FRE 802: Hearsay
589	TFL_SEC_00240195-96	2021.05.23	chat stability fund	No Objection
590	TFL_SEC_000269202-03	2022.05.16	chat terra taskforce created ESMA	FRE 401: Relevance; FRE 403: Prejudice
591	SEC-JUMPTRADE-E-0000094-95	2021.03.03	email: from Kwon to investment@terra.money and others re: [CONFIDENTIAL] Anchor seed round opportunity	No Objection
592	TFL_SEC_00113598-99	2021.03.23	email chain: Cantieri and Peter Johnson re: Matt from Anchor	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
593	TFL_EMP_00036369-70	2021.03.29	chat aggressive in the US access to norms	FRE 401: Relevance; FRE 403: Prejudice
594	TFL_SEC_00237650-51	2021.05.23	chat Opps Comms re depeg curve team offered buy few million of ust	No Objection
595	TFL_EMP_00020146-56	2021.05.29	Digital asset purchase and sale agreement	No Objection
596	TFL_SEC_00182450-51	2021.05.21-06.02	email chain re: Anchorage/Anchor supporting UST	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
597	JUMP0002252	2021.06.24	email MC to Imran Khan cc Kariya re: Meet Your Mentor -Anchor < Jump	FRE 403: Prejudice; FRE 802: Hearsay
598	TFL_SEC_00158230-31	2021.08-10.01	email chain re: Steps to claim your \$ANC Tokens (small US investor)	FRE 403: Prejudice; FRE 802: Hearsay
599	TFL_EMP_00036571-73	2021.10.18	chat MC worried anchor go bonkers ppl loop shit out of deposits	FRE 401: Relevance; FRE 403: Prejudice
600	HO-14164_JK_06727-33	2021.10.22	chat JK MC SJ anchor is a sitting duck	FRE 401: Relevance; FRE 403: Prejudice
601	HO-14164_JK_08526-30	2021.10.25	chat JK MC SJ Anchor is not decentralized	No Objection
602	TFL_EMP_00029172-74	2021.12.01	chat MC get Anchor into the hands of mainstream users not just degens	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
603	TFL_EMP_00036259-60	2022.02.09	chat UST all that matters to Terra	FRE 403: Prejudice; FRE 802: Hearsay
604	TFL_SEC_00182510	2022.02.10	email from MC First hit of pure anchor better be good	No Objection

605	N/A	2023.9.26	Subpoena to Testify	FRE 401: Relevance; FRE 403: Prejudice
606	TFL_SEC_00173807-16	2021.10.28	Cryptocurrency Purchase and Agreement HT Markets Terraform Labs	FRE 401: Relevance; FRE 403: Prejudice
607		2022.08.18	Organization Structure Chart	No Objection
608		2018.06.18	Director's Resolution in Writing - Incorporation of Subsidiary - Terraform Labs Limited	No Objection
609a		2022.03.31	Email to Ken Yong Poh re: Terra Labs - DBS Account	FRE 403: Prejudice; FRE 901: Authentication
609b		2022.03.31	Email to Ken Yong Poh re: Terra Labs - DBS Account attachment 1 20220329 wallet pdf	FRE 403: Prejudice; FRE 901: Authentication
609c		2022.03.31	Email to Ken Yong Poh re: Terra Labs - DBS Account attachment 2 20211217 [Terra SG] Subscription agreement (R3) executed	FRE 403: Prejudice; FRE 901: Authentication
609d		2022.03.31	Email to Ken Yong Poh re: Terra Labs - DBS Account attachment 3 20211005 [DL x TFL] Consulting agreement pdf	FRE 403: Prejudice; FRE 901: Authentication
610	TFL_SEC_00215947-58	2021.09.14	Liquidity Consulting and Loan Agreement	FRE 401: Relevance; FRE 403: Prejudice
611	TFL_SEC_00256930-32	2021.05.12	Outlet Finance, Inc. Side Letter	FRE 401: Relevance; FRE 403: Prejudice
612		No date	Terraform Labs Limited - First Director's Minutes	No Objection
613		No date	Transactions	FRE 401: Relevance; FRE 403: Prejudice
614		2021.10.13	Written Resolution of the Directors of the Board - Terraform Labs Limited	FRE 401: Relevance; FRE 403: Prejudice
615		2022.03.08	Ledger Statement	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay
616	TFL_SEC_A_00002858-77	2018.06.25	Territory of the British Virgin Islands - Memorandum and Articles of Association of Terraform Labs Limited	FRE 401: Relevance; FRE 403: Prejudice
617	TFL_SEC_002260355-71	2021.11.14	Employment Agreement	FRE 401: Relevance; FRE 403: Prejudice
618	LIGHTSPEED000000272	2021.04.07	Email from Luu to Kuan	FRE 401: Relevance; FRE 403: Prejudice
619a	LIGHTSPEED0000387-91	2021.06.21	Email from Samuel Harrison to Luu	FRE 401: Relevance; FRE 403: Prejudice
619b	LIGHTSPEED0000392-420	2021.06.21	Email from Samuel Harrison to Luu - attachment LUNA TSA -BCV FINAL pdf	FRE 401: Relevance; FRE 403: Prejudice
620	LIGHTSPEED0000055-57	2021.05.20	Email from Morgan Worth to CJ Han	FRE 401: Relevance; FRE 403: Prejudice
621		2021.12.20	Document: "Joining Terra as the head of Ecosystem Development"	FRE 401: Relevance; FRE 403: Prejudice
622	TFL_EMP_00020615	2022.02.05	Short message report	FRE 401: Relevance; FRE 403: Prejudice
623	TFL_SEC_00168556	2022.05.XX	Terra Ecosystem Team Exec Office document	FRE 401: Relevance; FRE 403: Prejudice
624	TFL_SEC_00214562	2022.05.02	Email to Do Kwon	FRE 401: Relevance; FRE 403: Prejudice
625	TFL_SEC_00194874	2022.04.29	Email to Luu	FRE 401: Relevance; FRE 403: Prejudice
626	LIGHTSPEED0000277-78	2021.03.16	Email from Kuan to Do Kwon	FRE 401: Relevance; FRE 403: Prejudice
627	HO-14164_JK_12104-07	2021.04.28	Short message report	FRE 401: Relevance; FRE 403: Prejudice
628	TFL_EMP_00047668-69	2022.03.07	Short message report	FRE 401: Relevance; FRE 403: Prejudice
629	N/A	2023.09.14	3rd amended notice of R. 30(b)(6) Depo	FRE 401: Relevance; FRE 403: Prejudice
630	TFL_EMP_00023776-85	2021.09.29	Telegram chat between Park and Chen	FRE 401: Relevance; FRE 403: Prejudice
631	TFL_EMP_00037995-96	2021.08.21	Telegram chat between Park and Kwon	FRE 401: Relevance; FRE 403: Prejudice
632	TFL_EMP_00055113-16	2021.06.21	Telegram chat between Park and Chen	FRE 401: Relevance; FRE 403: Prejudice
633	TFL_EMP_00037967-69	2021.11.01	Telegram chat between Park and Kwon	FRE 401: Relevance; FRE 403: Prejudice
634	TFL_EMP_00002328-34	2021.08.10	Telegram chat between Park and Kuan	FRE 401: Relevance; FRE 403: Prejudice
635	HO-14164_JK_09233-37	2021.08.11	Telegram chat between Park and Kuan	FRE 401: Relevance; FRE 403: Prejudice
636	HO-14164_JK_06003-06	2021.08.26	Telegram chat between Park and Kuan	FRE 401: Relevance; FRE 403: Prejudice
637	TFL_EMP_00003141-43	2021.07.29	Telegram chat between Park and Manav	FRE 401: Relevance; FRE 403: Prejudice
638	TFL_EMP_0002387-88	2022.01.26	Telegram chat between Park and Mahajan	FRE 401: Relevance; FRE 403: Prejudice
639	N/A	2021.06.29	flashdrive containing Park Presentation	FRE 401: Relevance; FRE 403: Prejudice
640	TFL_EMP_00039463-66	2021.08.13	Telegram chat between Park and Chen	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
641	TFL_EMP_00019947-52	2021.10.25	Telegram chat between Park, Kuan, and Cantieri	FRE 401: Relevance; FRE 403: Prejudice
642	HO-14164_JK_07501-07	2021.07.09	Telegram chat between Park and Kuan	FRE 401: Relevance; FRE 403: Prejudice
643	HO-14164_JK_03241-44	2021.10.29	Telegram chat between Park and Kuan	FRE 401: Relevance; FRE 403: Prejudice
644	TFL_EMP_00039434-44	2021.08.04	Telegram chat between Park and Chen	FRE 401: Relevance; FRE 403: Prejudice
645	POLY000000098-121	2018.07.11	Token Sale Agreement Terraform Polychain Fund	FRE 401: Relevance; FRE 403: Prejudice
646	AXRP00000001-24	2018.07.19	Token Sale Agreement Terraform Arrington XRP Capital	No Objection
647	TFL_SEC_00197684-707	2018.07.19	Token Sale Agreement Terraform Jack Abraham	No Objection
648a	CB_MIRROR_00000710	2021.02.04	Email+attachment re: Coinbase MIR listing	FRE 401: Relevance; FRE 403: Prejudice
648b	CB_MIRROR_00000711-31	2021.02.04	Email+attachment re: Coinbase MIR listing - attachment Mirror Protocol - Asset Addition Questionnaire 12.14.20 docx	FRE 401: Relevance; FRE 403: Prejudice; FRE 802: Hearsay; FRE 901: Authentication
649	N/A	2021.08.09	Medium.com post "Terra Goes Live on Wormhole V2"	FRE 401: Relevance; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay; FRE 403: Prejudice
650	N/A	2021.07.14	Anchor Protocol (@anchor_protocol) tweet	FRE 401: Relevance; FRE 403: Prejudice; FRE 602: Lacks Personal Knowledge; FRE 802: Hearsay
651a	N/A	2023.11.06	Appellate Court of Montenegro Second instance decision	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Pleadings: not admissible

651b	N/A	2023.11.06	translation of Appellate Court of Montenegro_Secord instance decision	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Transcript--not evidence
652	SEC-VakilA-E-0000004	2024.01	Arash Vakil Responses to Subpoena	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication; Pleadings: not admissible
653	N/A		About the Terra Protocol - Terra Classic Docs documentation	FRE 401: Relevance; FRE 403: Prejudice
654	N/A	2022.05.05	Kwon tweet re: LFG	FRE 401: Relevance; FRE 403: Prejudice
655	N/A	2022.05.07	Kwon tweet re: or you could remember they're all now poor...	FRE 401: Relevance; FRE 403: Prejudice
656	N/A	2022.05.10	Kwon tweet re: stay strong lunatics	FRE 401: Relevance; FRE 403: Prejudice
657	N/A	2020.12.03	Kwon @stablekwon Tweet re: Mirror	FRE 401: Relevance; FRE 403: Prejudice
658	N/A	No date	Photo of Kanav Kariya	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
659	N/A	No date	Photo of William DiSomma	FRE 401: Relevance; FRE 403: Prejudice; FRE 901: Authentication
660	N/A	No date	Photo of Do Kwon	FRE 401: Relevance; FRE 403: Prejudice



Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0001	Article	JP Morgan Chase & Co., Oliver Wyman, "Deposit Tokens: A foundation for stable digital money," p. 18, (2022). <a href="https://www.jpmorgan.com/onys/documents/deposit-tokens.pdf">https://www.jpmorgan.com/onys/documents/deposit-tokens.pdf</a>	2022			Hearsay Relevance Foundation
D-0002	Article	Glossary of Terms Related to Payment, Clearing and Settlement Systems, European Central Bank	Dec 2009			Hearsay Relevance Foundation
D-0003	Article	David Mills, et al., Distributed ledger technology in payments, clearing, and settlement, Finance and Economics Discussion Series 2016-095. Washington: Board of Governors of the Federal Reserve System. <a href="https://doi.org/10.17016/FEDS.2016.095">https://doi.org/10.17016/FEDS.2016.095</a>	Dec 2016			Hearsay Relevance Foundation
D-0004	Article	N. Do, Terra: A price-stable and democratic money-as-protocol, v0.0.8. <a href="https://classic-docs.terra.money/docs/learn/protocol.html">https://classic-docs.terra.money/docs/learn/protocol.html</a>	3/19/2018	TFL_SEC_00168805	TFL_SEC_00168823	Hearsay if offered by defendants for truth
D-0005	Article	Medium post, "Scaling Seigniorage." <a href="https://medium.com/terra-money/scaling-seigniorage-a72356a118ae">https://medium.com/terra-money/scaling-seigniorage-a72356a118ae</a>	12/17/2018			Hearsay Relevance
D-0006	Article	What are Blockchain Protocols and How Do [T]hey Work?, Medium. <a href="https://medium.com/@genesishack/draft-what-are-blockchain-protocols-and-how-do-they-work-94815be5efa7">https://medium.com/@genesishack/draft-what-are-blockchain-protocols-and-how-do-they-work-94815be5efa7</a>	12/21/2018			Hearsay Relevance Foundation
D-0007	Article	Evan Kereiakes et al., Terra Money: Stability and Adoption	April 2019	ECF 102-5	ECF 102-5	None
D-0008	Article	Terra, Countdown to Terra Mainnet Launch, Medium. <a href="https://medium.com/terra-money/countdown-to-terra-mainnet-launch-f8c0b998c12a">https://medium.com/terra-money/countdown-to-terra-mainnet-launch-f8c0b998c12a</a>	4/16/2019			Hearsay if offered by defendants for truth
D-0009	Article	Terra partners with mobile payment app CHAI to service the growing eCommerce market, Medium. <a href="https://medium.com/terra-money/terra-partners-with-mobile-payment-app-chai-29c593f0a364">https://medium.com/terra-money/terra-partners-with-mobile-payment-app-chai-29c593f0a364</a>	6/11/2019			None
D-0010	Article	June 2019 Terra Community Update, Medium. <a href="https://medium.com/terra-money/june-2019-terra-community-update-d8904635afc4">https://medium.com/terra-money/june-2019-terra-community-update-d8904635afc4</a>	6/21/2019			Hearsay if offered by defendants for truth
D-0011	Article	Tobias HunAdrian and Tommaso Mancini Griffoli, The Rise of Digital Money, IMF, p. 2. <a href="https://www.imf.org/en/Publications/fintech-notes/Issues/2019/07/12/The-Rise-of-Digital-Money-47097">https://www.imf.org/en/Publications/fintech-notes/Issues/2019/07/12/The-Rise-of-Digital-Money-47097</a>	7/15/2019			Hearsay Relevance Foundation
D-0012	Article	Jess Li, An Interview with Allison Barr Allen, Head of Global Product Operations on the Money Team at Uber, Medium. <a href="https://medium.com/alpha-conversations/an-interview-with-allison-barr-allen-head-of-global-product-operations-on-the-money-team-at-uber-7549c014c6be">https://medium.com/alpha-conversations/an-interview-with-allison-barr-allen-head-of-global-product-operations-on-the-money-team-at-uber-7549c014c6be</a>	7/18/2019			Hearsay Relevance Foundation
D-0013	Article	"The Omnibus Model for Custody," <i>Fidelity Digital Assets</i> . <a href="https://www.fidelitydigitalassets.com/research-and-insights/omnibus-model-custody">https://www.fidelitydigitalassets.com/research-and-insights/omnibus-model-custody</a>	1/21/2020			Hearsay Relevance Foundation
D-0014	Article	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0015	Article	Economics of Seigniorage - The Case of Chai, by Nicolas Andreoulis	Feb 2020	TFL_SEC_00269546	TFL_SEC_00269549	Hearsay
D-0016	Article	N. Platias, et al., Anchor: Gold Standard for Passive Income on the Blockchain	May 2020	TFL_SEC_00280351	TFL_SEC_00280364	Hearsay if offered by defendants for truth
D-0017	Article	Anchor Whitepaper, <i>Anchor: Gold Standard for Passive Income on the Blockchain</i> , by Nicholas Platias, Eui Joon Lee, and Marco Di Maggio	June 2020	TFL_SEC_00249235		None
D-0018	Article	Allison Barr Allen, Payments Are Far More Complicated Than You Think, Forbes. <a href="https://www.forbes.com/sites/forbestechcouncil/2020/06/30/payments-are-far-more-complicated-than-you-think/?sl=8de7c764f6b">https://www.forbes.com/sites/forbestechcouncil/2020/06/30/payments-are-far-more-complicated-than-you-think/?sl=8de7c764f6b</a>	6/30/2020			Hearsay Relevance Foundation
D-0019	Article	MIR Token Projections	Sept 2020			Hearsay Relevance
D-0020	Article	Mirror: a synthetic asset protocol	Sept 2020	TFL_0017068	TFL_0017081	Hearsay Relevance
D-0021	Article	D. Kwon, Announcing TerraUSD (UST)— the Interchain Stablecoin, Medium. <a href="https://medium.com/terra-money/announcing-terrausd-ust-the-interchain-stablecoin-53eab0f8f0ac">https://medium.com/terra-money/announcing-terrausd-ust-the-interchain-stablecoin-53eab0f8f0ac</a>	9/21/2020			Hearsay if offered by defendants for truth

Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0022	Article	Mirror: Reflecting Asset Value On-Chain ("Mirror Whitepaper V1"). <a href="https://api-new.whitepaper.io/documents/pdf?id=S1UukQJru#&amp;:text=Mirror%20is%20a%20protocol%20that,traditional%20equities%20to%20real%20estate.&amp;text=Mirror%20unleashes%20the%20full%20power,3.1">https://api-new.whitepaper.io/documents/pdf?id=S1UukQJru#&amp;:text=Mirror%20is%20a%20protocol%20that,traditional%20equities%20to%20real%20estate.&amp;text=Mirror%20unleashes%20the%20full%20power,3.1</a>	10/23/2020			Hearsay Relevance Foundation
D-0023	Article	Mirror Executive Summary	11/6/2020	TFL_SEC_00160572	TFL_SEC_00160575	Hearsay Relevance
D-0024	Article	Arrington XRP Capital, "The Standard for Synthetic Assets: Mirror."	12/3/2020	SEC-CurranB-E-0028269	SEC-CurranB-E-0028290	Hearsay Relevance
D-0025	Article	Mirror, 'An Introduction to MIR Token Farming on Mirror Protocol'	12/3/2020			Hearsay Relevance
D-0026	Article	[USTRADINGFIRM], Governance Proposal, Agora "Terra on-chain liquidity parameters"	1/20/2021			Hearsay Relevance Foundation
D-0027	Article	"Transaction Details," Terrafinder. <a href="https://finder.terraclassic.community/mainnet/bx/556C43B7A4452CF4C04DB9097FC07BBB77266A3F3738AF31AE9F96D7C9409DS">https://finder.terraclassic.community/mainnet/bx/556C43B7A4452CF4C04DB9097FC07BBB77266A3F3738AF31AE9F96D7C9409DS</a>	1/20/2021			Relevance Foundation
D-0028	Article	American Institute for Economic Research, 'Algorithmic Stablecoins'	2/1/2021			Hearsay Relevance Foundation
D-0029	Article	S. Kim, January 2021 Community Update, Medium. <a href="https://medium.com/terra-money/january-2021-community-update-26901fc1d509">https://medium.com/terra-money/january-2021-community-update-26901fc1d509</a>	2/4/2021			Hearsay if offered by defendants for truth
D-0030	Article	Do Kwon, "Agora Thread - Reserve Withdrawals and UST Market Sales"	3/19/2021			Hearsay Relevance
D-0031	Article	Mapping out Terra's ecosystem, The Block.	4/26/2021	TFL_SEC_00297596	TFL_SEC_00297609	Hearsay Relevance Foundation
D-0032	Article	[USTRADINGFIRM], Agora Governance Proposal "Liquidity Parameters - 2"	5/21/2021			Hearsay Relevance Foundation
D-0033	Article	Medium Article, "Stablecoins - Defining the Terra Algorithmic Design" by Brian Curran. <a href="https://medium.com/terra-money/stablecoins-defining-the-terra-algorithmic-design-5d952fd68d">https://medium.com/terra-money/stablecoins-defining-the-terra-algorithmic-design-5d952fd68d</a>	6/9/2021			Hearsay Relevance
D-0034	Article	S. Liu and I. Lee, Mirror Protocol V2 ("Mirror Whitepaper V2"). <a href="https://730577551-files.gitbook.io/~files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2F-MLRzugf7mxc4ryNtTuq%2Fuploads%2F03znySsjF6CiLrcT0ml%2FMirror_Protocol_V2.pdf?alt=media&amp;token=b5728c7d-7f12-4d41-8ce6-8347da02b9ff">https://730577551-files.gitbook.io/~files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2F-MLRzugf7mxc4ryNtTuq%2Fuploads%2F03znySsjF6CiLrcT0ml%2FMirror_Protocol_V2.pdf?alt=media&amp;token=b5728c7d-7f12-4d41-8ce6-8347da02b9ff</a>	6/15/2021			Hearsay Relevance
D-0035	Article	Medium article, "Introducing the \$150 Million Terra Ecosystem Fund" by "The Intern" i.e. Brian Curran. <a href="https://medium.com/terra-money/introducing-the-150-million-terra-ecosystem-fund-6aee01629edc">https://medium.com/terra-money/introducing-the-150-million-terra-ecosystem-fund-6aee01629edc</a>	7/16/2021			Hearsay Relevance
D-0036	Article	Everstake, Anchor Protocol: A Savings Protocol Offering Up To 20% APY, Medium. <a href="https://everstake.medium.com/anchor-protocol-for-beginners-how-to-get-started-5b19f54ced6d#:~:text=The%20platform%20was%20built%20by,launched%20on%20March%2017%2C%202021">https://everstake.medium.com/anchor-protocol-for-beginners-how-to-get-started-5b19f54ced6d#:~:text=The%20platform%20was%20built%20by,launched%20on%20March%2017%2C%202021</a>	7/19/2021			Hearsay Relevance Foundation
D-0037	Article	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0038	Article	Mirror Community Update - May 2021, Medium. <a href="https://medium.com/mirror-protocol/mirror-community-update-may-2021-669e30e180ca">https://medium.com/mirror-protocol/mirror-community-update-may-2021-669e30e180ca</a>	9/1/2021			Hearsay Relevance
D-0039	Article	Ryan Clements, Built to Fail: The Inherent Fragility of Algorithmic Stablecoins, 11 Wake Forest L. Rev. Online 131 (October 2021). <a href="https://www.wakeforestlawreview.com/2021/10/built-to-fail-the-inherent-fragility-of-algorithmic-stablecoins/">https://www.wakeforestlawreview.com/2021/10/built-to-fail-the-inherent-fragility-of-algorithmic-stablecoins/</a>	11/18/2021			Hearsay Relevance Foundation
D-0040	Article	Mario Gabriele article "Terra: The Moon Also Rises." <a href="https://www.generalist.com/briefing/terra">https://www.generalist.com/briefing/terra</a>	11/21/2021			Hearsay Relevance Foundation
D-0041	Article	Duncan Roucassel and Genevieve Yeoh, "Mapping the Moon: An Overview of Terra's Ecosystem," Delphi Digital. <a href="https://members.delphidigital.io/reports/mapping-the-moon-an-overview-of-terras-ecosystem">https://members.delphidigital.io/reports/mapping-the-moon-an-overview-of-terras-ecosystem</a>	12/22/2021			Hearsay Relevance Foundation
D-0042	Article	Luna Foundation Guard (LFG) Officially Formed as Non-Profit Organization Dedicated to Supporting the Terra Ecosystem and Open-Source Technology	1/19/2022	TFL_SEC_00173683	TFL_SEC_00173684	Hearsay Relevance
D-0043	Article	TFL Medium, 'Formation of the Luna Foundation Guard (LFG)'	1/19/2022			Hearsay Relevance
D-0044	Article	Luna Foundation Guard (LFG) Raises \$1 Billion for a Bitcoin-Denominated Forex Reserve for Terra's UST Stablecoin	2/22/2022	TFL_SEC_00169087	TFL_SEC_00169088	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0045	Article	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0046	Article	Alexander Osipovich, <i>Cutting-Edge Crypto Coins Tout Stability. Critics Call Them Dangerous</i> , Wall Street Journal. <a href="https://www.wsj.com/articles/cutting-edge-crypto-coins-tout-stability-critics-call-them-dangerous-11650226597">https://www.wsj.com/articles/cutting-edge-crypto-coins-tout-stability-critics-call-them-dangerous-11650226597</a>	4/18/2022			Hearsay Relevance Foundation
D-0047	Article	David Z. Morris, "Built to Fail": Why TerraUSD's Growth is Giving Finance Experts Nightmares, CoinDesk. <a href="https://www.coindesk.com/layer2/2022/04/22/built-to-fail-why-terrausds-growth-is-giving-finance-experts-nightmares/">https://www.coindesk.com/layer2/2022/04/22/built-to-fail-why-terrausds-growth-is-giving-finance-experts-nightmares/</a>	4/22/2022			Hearsay Relevance Foundation
D-0048	Article	"Transaction Details," Terrafinder. <a href="https://finder.terraclassic.community/mainnet/tx/3FCEE1818E2A3D520787461D6C456F17E812DBD395A88EBE00F222271B3CAF56">https://finder.terraclassic.community/mainnet/tx/3FCEE1818E2A3D520787461D6C456F17E812DBD395A88EBE00F222271B3CAF56</a>	5/23/2022			Relevance Foundation
D-0049	Article	Business Insider, 'Proof of Stake vs. Proof of Work'	11/21/2022			Hearsay Relevance Foundation
D-0050	Article	Mirror Protocol, Mirror User Guide, Medium. <a href="https://medium.com/mirror-protocol/mirror-user-guide-fb1cc4a28258">https://medium.com/mirror-protocol/mirror-user-guide-fb1cc4a28258</a>	12/3/2022			Hearsay Relevance
D-0051	Article	Forbes Fintech Daily Cover, <i>With Sam Bankman-Fried's Hedge Fund Gone, Crypto Trading Firm Wintermute Emerges</i> .	12/20/2022			Hearsay Relevance Foundation
D-0052	Article	Decrypt, 'A Brief History of DeFi'	2/9/2023			Hearsay Relevance Foundation
D-0053	Article	"Custodial vs Non-Custodial Wallets," Crypto.com. <a href="https://crypto.com/university/custodial-vs-non-custodial-wallets">https://crypto.com/university/custodial-vs-non-custodial-wallets</a>	2/17/2023			Hearsay Relevance Foundation
D-0054	Article	"Custodial vs. Non-Custodial Wallets: What's the Difference?," Binance Academy. <a href="https://academy.binance.com/en/articles/custodial-vs-non-custodial-wallets-what-s-the-difference">https://academy.binance.com/en/articles/custodial-vs-non-custodial-wallets-what-s-the-difference</a>	8/2/2023			Hearsay Relevance Foundation
D-0055	Article	"PayPal Launches U.S. Dollar Stablecoin," PayPal Newsroom. <a href="https://newsroom.paypal-corp.com/2023-08-07-PayPal-Launches-U-S-Dollar-Stablecoin">https://newsroom.paypal-corp.com/2023-08-07-PayPal-Launches-U-S-Dollar-Stablecoin</a>	8/7/2023			Hearsay Relevance Foundation
D-0056	Article	Cryptocurrency Wallet: What It Is, How It Works, Types, Security. <a href="https://www.investopedia.com/terms/b/bitcoin-wallet.asp#:~:text=A%20cryptocurrency%20wallet%20is%20a,needed%20to%20sign%20cryptocurrency%20transactions">https://www.investopedia.com/terms/b/bitcoin-wallet.asp#:~:text=A%20cryptocurrency%20wallet%20is%20a,needed%20to%20sign%20cryptocurrency%20transactions</a>	8/29/2023			Hearsay Relevance
D-0057	Article	Harmonised ISO 20022 Data Requirements for Enhancing Cross-border Payments, Bank of Korea. <a href="https://www.bok.or.kr/eng/bbs/E0000634/view.do?nttlid=10080032&amp;menuNo=400069">https://www.bok.or.kr/eng/bbs/E0000634/view.do?nttlid=10080032&amp;menuNo=400069</a>	10/18/2023			Hearsay Relevance Foundation
D-0058	Article	CoinDesk, 'What is an Oracle'	12/22/20, updated 2/9/23			Hearsay Relevance Foundation
D-0059	Article	Stablecoin Startup Terra Expands to Mongolia With Taxi Payment Service, CoinDesk. <a href="https://www.coindesk.com/business/2019/12/13/stablecoin-startup-terra-expands-to-mongolia-with-taxi-payment-service/">https://www.coindesk.com/business/2019/12/13/stablecoin-startup-terra-expands-to-mongolia-with-taxi-payment-service/</a>	12/13/2019, updated 5/8/23			Hearsay Relevance Foundation
D-0060	Article	Linux Information Project Definition. <a href="https://www.linfo.org/source_code.html">https://www.linfo.org/source_code.html</a>	5/23/04, updated 2/14/06			Hearsay Relevance Foundation
D-0061	Article	"Coinone Withdraw," Chainscope. <a href="https://chainscope.pe/terra2/address/terra1al546tmrj0wmwfctcqkch47h57h23mch7d8xqa">https://chainscope.pe/terra2/address/terra1al546tmrj0wmwfctcqkch47h57h23mch7d8xqa</a>	n.d.			Hearsay Relevance Foundation
D-0062	Article	"Cryptocurrency on PayPal Purchase questions," PayPal. <a href="https://www.paypal.com/uk/cshelp/article/cryptocurrency-on-paypal-purchase-questions-help576">https://www.paypal.com/uk/cshelp/article/cryptocurrency-on-paypal-purchase-questions-help576</a>	n.d.			Hearsay Relevance Foundation
D-0063	Article	"Terra Station," Google Play. <a href="https://play.google.com/store/apps/details?id=money.terra.station">https://play.google.com/store/apps/details?id=money.terra.station</a>	n.d.			Hearsay Relevance Foundation
D-0064	Article	"Transaction Lifecycle," Cosmos SDK. <a href="https://docs.cosmos.network/v0.46/basics/tx-lifecycle.html">https://docs.cosmos.network/v0.46/basics/tx-lifecycle.html</a>	n.d.			Hearsay Relevance Foundation
D-0065	Article	"What is a REST API?," IBM. <a href="https://www.ibm.com/topics/rest-apis">https://www.ibm.com/topics/rest-apis</a>	n.d.			Hearsay Relevance Foundation
D-0066	Article	About Terra, Terra. <a href="https://www.terra.money/about-terra">https://www.terra.money/about-terra</a>	n.d.			Hearsay if offered by defendants for truth



Ex.	Type	Description	Document Date	Seg. Bates No.	End. Bates No.	SEC's Objection
D-0067	Article	Explore the ecosystem. <a href="https://classic-docs.terra.money/docs/ecosystem/explore.html">https://classic-docs.terra.money/docs/ecosystem/explore.html</a>	n.d.			Hearsay if offered by defendants for truth
D-0068	Article	Terra Classic Website, 'About the Terra Protocol.' <a href="https://classic-docs.terra.money/docs/learn/protocol.html">https://classic-docs.terra.money/docs/learn/protocol.html</a>	n.d.			Hearsay if offered by defendants for truth
D-0069	Article	Terra Classic Website, 'Fees on Terra'	n.d.			Hearsay Relevance
D-0070	Article	Terra Classic Website, 'Glossary'	n.d.			Hearsay Relevance
D-0071	Article	The Open Source Definition, Open Source Initiative. <a href="https://opensource.org/osd/">https://opensource.org/osd/</a>	n.d.			Hearsay Relevance Foundation
D-0072	Article	The Standard for Synthetic Assets: Mirror	n.d.	TFL_SEC_00276103	TFL_SEC_00276120	Hearsay Relevance
D-0073	Article	Validators FAQ, Terra Docs, retrieved from Validator FAQ — Terra Classic Docs documentation	n.d.			Hearsay Relevance
D-0074	Article	"Brands," <i>Able C&amp;C</i> , <a href="http://www.able-cnc.com/en/brands">http://www.able-cnc.com/en/brands</a>				Hearsay Relevance Foundation
D-0075	Article	"Bungaejangter," <i>Crunchbase</i> . <a href="https://www.crunchbase.com/organization/quicket">https://www.crunchbase.com/organization/quicket</a>				Hearsay Relevance Foundation
D-0076	Article	"Chainalysis Academy," <i>Chainalysis</i> . <a href="https://academy.chainalysis.com/">https://academy.chainalysis.com/</a>				Hearsay Relevance Foundation
D-0077	Article	"DAILYHOTEL," <i>Crunchbase</i> . <a href="https://www.crunchbase.com/organization/dailyhotel">https://www.crunchbase.com/organization/dailyhotel</a>				Hearsay Relevance Foundation
D-0078	Article	"Market share of online payment processing technologies worldwide as of December 2023," <i>Statista</i> . <a href="https://www.statista.com/statistics/895236/australia-market-share-online-payment-platforms/">https://www.statista.com/statistics/895236/australia-market-share-online-payment-platforms/</a>				Hearsay Relevance Foundation
D-0079	Article	"NHN Bugs," <i>Crunchbase</i> . <a href="https://www.crunchbase.com/organization/nhn-bugs">https://www.crunchbase.com/organization/nhn-bugs</a>				Hearsay Relevance Foundation
D-0080	Article	"OHouse," <i>Crunchbase</i> . <a href="https://www.crunchbase.com/organization/bucketplace">https://www.crunchbase.com/organization/bucketplace</a>				Hearsay Relevance Foundation
D-0081	Article	"Send money at the speed of life," <i>PayPal</i> . <a href="https://www.paypal.com/uk/digital-wallet/send-receive-money/send-money">https://www.paypal.com/uk/digital-wallet/send-receive-money/send-money</a>				Hearsay Relevance Foundation
D-0082	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/2E383D61FF67DB96E86C314435A15E9531AF8B8F80C7500C1AD3854466BA1624">https://finder.terra.money/classic/tx/2E383D61FF67DB96E86C314435A15E9531AF8B8F80C7500C1AD3854466BA1624</a>				Relevance Foundation
D-0083	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/3C913B2727EC3C0EFE8D48AE948F1C03C265A7CD6A0D3E14D87688657E090BF7">https://finder.terra.money/classic/tx/3C913B2727EC3C0EFE8D48AE948F1C03C265A7CD6A0D3E14D87688657E090BF7</a>				Relevance Foundation
D-0084	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/4E145B266E85B5A5D73B62F4E44DF7DF5AB3871BCD45AED2AA7E2F15583F182">https://finder.terra.money/classic/tx/4E145B266E85B5A5D73B62F4E44DF7DF5AB3871BCD45AED2AA7E2F15583F182</a>				Relevance Foundation
D-0085	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/67F33141B22608AAF049183D48FF8E12141BAAC1FB760C3063BCB18E73922749">https://finder.terra.money/classic/tx/67F33141B22608AAF049183D48FF8E12141BAAC1FB760C3063BCB18E73922749</a>				Relevance Foundation
D-0086	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/853C5C65B9196DC32A71764245FDB46B138DB71D69E6093EE089CF39254BA5ED">https://finder.terra.money/classic/tx/853C5C65B9196DC32A71764245FDB46B138DB71D69E6093EE089CF39254BA5ED</a>				Relevance Foundation
D-0087	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/AE71AA0BC098B1DDB433EDDA7CCFF8259E2C5A3A02FB5A95A54DF34C31FF8B3C">https://finder.terra.money/classic/tx/AE71AA0BC098B1DDB433EDDA7CCFF8259E2C5A3A02FB5A95A54DF34C31FF8B3C</a>				Relevance Foundation
D-0088	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/D8F3030262B082F3D5773D44FAE2132DC4ABC69166CDB53E6F4511DC65073F9">https://finder.terra.money/classic/tx/D8F3030262B082F3D5773D44FAE2132DC4ABC69166CDB53E6F4511DC65073F9</a>				Relevance Foundation
D-0089	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/E2905FF3CA241A68CFBB7A6BE176AC1354D5ABEAA14B251304F8ABDAEC931F9E">https://finder.terra.money/classic/tx/E2905FF3CA241A68CFBB7A6BE176AC1354D5ABEAA14B251304F8ABDAEC931F9E</a>				Relevance Foundation
D-0090	Article	"Transaction Details," <i>Terrafinder</i> . <a href="https://finder.terra.money/classic/tx/EC92CAFB2BE8A4764FC0F28637F7991FBA64CA7208DF710457DA7BCBD9150E54">https://finder.terra.money/classic/tx/EC92CAFB2BE8A4764FC0F28637F7991FBA64CA7208DF710457DA7BCBD9150E54</a>				Relevance Foundation

## Joint Pre-Trial Order, Exhibit B

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0091	Article	"What are Microservices?," AWS. <a href="https://aws.amazon.com/microservices/">https://aws.amazon.com/microservices/</a>				Hearsay Relevance Foundation
D-0092	Article	"Yanolja," Crunchbase. <a href="https://www.crunchbase.com/organization/yanolja">https://www.crunchbase.com/organization/yanolja</a>				Hearsay Relevance Foundation
D-0093	Article	QR code payment service used by 33 million people* that was released in three months," AWS, 2021. <a href="https://aws.amazon.com/solutions/case-studies/paypay/">https://aws.amazon.com/solutions/case-studies/paypay/</a>				Hearsay Relevance Foundation
D-0200	Deposition	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0300	Document	2018 Investor Deck	2018	TFL_SEC_00205387	TFL_SEC_00205406	Hearsay
D-0301	Document	Terra Private Sales Terms	2018	TFL_SEC_00283830	TFL_SEC_00283839	Hearsay Relevance
D-0302	Document	2019 Investor Deck	2019	TFL_SEC_00218977	TFL_SEC_00219003	Hearsay
D-0303	Document	Chai Operating Plan Showing Seigniorage for Projections in FY2020	2020	TFL_SEC_00262609	TFL_SEC_00262609	Hearsay Foundation Authenticity
D-0304	Document	Bank for International Settlements. <a href="https://www.bis.org/cpmi/publ/d157.pdf">https://www.bis.org/cpmi/publ/d157.pdf</a>	Feb 2017			Hearsay Relevance Foundation
D-0305	Document	Seoul Central District Court decision regarding Myung Aaron Hong, with Official Korean to English Translation and Certification	11/8/2017	ECF 125-39		Hearsay Relevance Improper 609 Impeachment FRE 403
D-0306(A)	Document	Notice of Entry Refusal regarding deportee, Myung Aaron Hong - Original Korean	2/9/2018	ECF 125-40		Hearsay Relevance Improper 609 Impeachment FRE 403
D-0306(B)	Document	Notice of Entry Refusal regarding deportee, Myung Aaron Hong - Original Korean	2/9/2018	ECF 125-40		Hearsay Relevance Improper 609 Impeachment FRE 403
D-0307	Document	Terra Stability Analysis	5/13/2018			Hearsay Authenticity
D-0308	Document	TerraPay Partnership Invitation Proposal	7/10/2018	TFL_SEC_00317962	TFL_SEC_00317983	Hearsay if offered by defendants for truth
D-0309	Document	Written Resolution of Terraform Labs Ltd. Regarding Issuance of LUNA Tokens	7/20/2018	TFL_SEC_00270311	TFL_SEC_00270317	Hearsay Relevance Foundation
D-0310	Document	Luna Private Sale Terms	9/11/2018	POLY10013394; AM-17	POLY10013404; AM-17	Hearsay Relevance
D-0311	Document	Terra Pitch Deck	9/11/2018			Hearsay if offered by defendants for truth
D-0312	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0313	Document	Token Sale Agreement	12/9/2018	TFL_SEC_A_00109732	TFL_SEC_A_00109761	Relevance
D-0314	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0315	Document	Token Sales Agreement (Seed Round)	3/1/2019	TFL_SEC_A_00107890	TFL_SEC_A_00107914	Relevance
D-0316	Document	Terra Finder Chai Transaction Details	6/14/2019			Relevance Foundation
D-0317	Document	Investment Agreement between Chai/TFL and Certified English translation	6/26/2019			None
D-0318	Document	TFL-Chai Investment Agreement	6/26/2019	TFL_SEC_00269628	TFL_SEC_00269633	None
D-0319	Document	Yanolja-Chai-TFL Promotion and Support Agreement, English Translation and Original Korean Version	8/23/2019			None
D-0320	Document	Yanolja-Chai-TFL Service Agreement, English Translation and Original Korean Version	8/23/2019			None
D-0321	Document	Master Digital Currency Loan Agreement between Tai Mo Shan Limited and Terraform Labs PTE LTD	11/19/2019	TFL_SEC_00221130	TFL_SEC_00221137	None
D-0322	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0323	Document	Terra Chain Merchant Address Matching (테라체인 머천트 주소 맞추기)," GitHub Gist. <a href="https://gist.github.com/johnny0516/2c4d0eef763b5387468c49fb6a28c2ec">https://gist.github.com/johnny0516/2c4d0eef763b5387468c49fb6a28c2ec</a> ; Korean	2/9/2020			Hearsay Authenticity Foundation
D-0324	Document	Terra Chain Merchant Address Matching (테라체인 머천트 주소 맞추기)," GitHub Gist. <a href="https://gist.github.com/johnny0516/2c4d0eef763b5387468c49fb6a28c2ec">https://gist.github.com/johnny0516/2c4d0eef763b5387468c49fb6a28c2ec</a> ; English translation.	2/9/2020			Hearsay Authenticity Foundation

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0325	Document	Agora Proposal_Chai Seigniorage	3/18/2020			Hearsay Relevance Foundation Authenticity
D-0326	Document	Terra Development Grant Master Agreement for Chorus One Grant Agreement	5/29/2020			Relevance Foundation
D-0327	Document	Anchor PowerPoint Presentation, Introducing Anchor	Aug 2020	TFL_SEC_00196673	TFL_SEC_00196684	Hearsay if offered by defendants for truth
D-0328	Document	Master Loan Agreement	8/16/2020	SEC-JUMPTRADE-E-0000039	SEC-JUMPTRADE-E-0000054	None
D-0329	Document	TFL Pte. Ltd. Directors' Resolution	8/31/2020	TFL_SEC_00270260	TFL_SEC_00270260	None
D-0330	Document	Loan Confirmation	9/8/2020	SEC-JUMPTRADE-E-0000074; DiSomma Ex. 6	SEC-JUMPTRADE-E-0000079; DiSomma Ex. 6	None
D-0331	Document	SAFT (Simple Agreement for Farmed Tokens) with Accomplish Blockchain Two Limited	9/30/2020	TFL_SEC_00163782	TFL_SEC_00163791	Relevance
D-0332	Document	SAFT (Simple Agreement for Farmed Tokens) with Variant Fund LP	10/2/2020	TFL_SEC_00171850	TFL_SEC_00171859	Relevance
D-0333	Document	Tai Mo Shan OTC Trading Agreement	10/4/2020	TFL_SEC_00219392	TFL_SEC_00219398	None
D-0334	Document	LP Server Transaction History dated October 8, 2020 to October 9, 2020	10/9/2020	ECF 125-76		Hearsay Foundation Authenticity
D-0335	Document	Remittance Information Form for beneficiary Terraform Labs from KEB Hana Bank	12/31/2020	ECF 125-29		Hearsay Relevance Foundation Authenticity
D-0336	Document	Amended and Restated Loan Confirmation	4/2/2021	SEC-JUMPTRADE-E-0001749	SEC-JUMPTRADE-E-0001753	None
D-0337	Document	Terra Finder Topup Transfer Transaction Details	4/14/2021	ECF 125-62		None
D-0338	Document	Luna Token Sale Agreement	5/17/2021	TFL_SEC_A_00107811	TFL_SEC_A_00107839	None
D-0339	Document	Intentionally left blank				n/a - exhibit withdrawn
D-0340	Document	Second Amended and Restated Loan Agreement (Ex. 271)	July 2021	JUMP0085523; SEC SJ Ex. 271	JUMP0085526; SEC SJ Ex. 271	None
D-0341	Document	Second Amended and Restated Loan Confirmation	7/22/2021	JUMP0085525; ECF 102-57	JUMP0085526; ECF 102-57	None
D-0342	Document	Settlement Chai Finance Record dated April 14, 2021 through September 9, 2021	9/9/2021	ECF 125-58		Hearsay Relevance Foundation Authenticity
D-0343	Document	Delphi Cosmos Explainer, "The Cosmos Ecosystem has Arrived"	9/15/2021	TFL_SEC_00196181	TFL_SEC_00196195	Hearsay Relevance Foundation
D-0344	Document	Intentionally left blank				n/a - exhibit withdrawn
D-0345	Document	SAFT (Simple Agreement for Farmed Tokens) with Arrington XRP Capital, Cayman SVP, Ltd.	9/30/2021	TFL_SEC_00162679	TFL_SEC_00162688	Relevance
D-0346	Document	Tips, Complaints, and Referrals form (TCR ID 853511) submitted to the SEC October 2, 2021	10/2/2021	ECF 125-44	ECF 125-44	Hearsay
D-0347	Document	Anchor Terms of Service	10/12/2021	ECF 122-1		Hearsay Authenticity Foundation
D-0348	Document	Tips, Complaints, and Referrals form (TCR ID 854815) submitted to the SEC October 16, 2021	10/16/2021	ECF 125-42; Myung Ex. 18		Hearsay
D-0349	Document	Tips, Complaints, and Referrals form (TCR ID 854817) submitted to the SEC October 16, 2021	10/16/2021	ECF 125-43; Myung Ex. 18A		Hearsay
D-0350	Document	Chai Payment and Settlement Worksheet dated April 22, 2021 through December 5, 2021, with Official Korean to English Translation and Certification	12/5/2021	ECF 125-65		Hearsay Foundation Authenticity
D-0351	Document	QCP Capital Pte. Ltd. Master Trading Agreement	12/15/2021	ECF 125-4		Relevance
D-0352	Document	Delphi Digital Research Report by Duncan Reucassel and Genevieve Yeoh, "Mapping The Moon: An Overview of Terra's Ecosystem"	12/22/2021	TFL_SEC_00169713	TFL_SEC_00169734	Hearsay Relevance Foundation
D-0353	Document	LFG Press Release, Luna Foundation Guard (LFG) Officially Formed as Non-Profit Organization Dedicated to Supporting the Terra Ecosystem and Open-Source Technology	1/19/2022	ECF 30-3		Hearsay Relevance
D-0354	Document	Token Sale Agreement between LFG and TLL BVI	2/14/2022	TFL_SEC_00152998	TFL_SEC_00153025	None
D-0355	Document	Tips, Complaints, and Referrals form (TCR ID 871227) submitted to the SEC February 25, 2022	2/25/2022	EXF 125-45		Hearsay
D-0356	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0357	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0358	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0359	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0360	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0361	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0362	Document	Written Resolution of the Terraform Labs Ltd. Directors regarding Babel Finance (Confidential)		TFL_SEC_00270362		Hearsay Relevance
D-0363	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0364	Document	Galaxy Primer 'An Introduction to Digital Assets'	4/19/2022	GD_MIR00034743	GD_MIR00034920	Hearsay Relevance Foundation
D-0365	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0366	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0367	Document	Tribe Capital Management, LLC -- 221 Events in Crypto: Terra LUNA	May 2022	TRIB00003357; Sethi Ex. 30	TRIB00003373	Hearsay Relevance Foundation
D-0368	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0369	Document	Graph of Total UST Deposited in Anchor Protocol (5/4/21-5/6/22)	5/6/2022	ECF 102-37		Hearsay Foundation
D-0370	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0371	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0372	Document	Wintermute Transaction ledger, from the period of 1 March 2022 to 17 May 2022				Relevance
D-0373	Document	Letter from Levy Firestone Muse to James Hunsaker re Engagement Letter	6/30/2022	LFM-000136 TFL_SEC_00349313	LFM-000138 TFL_SEC_00349315	Hearsay Relevance
D-0374	Document	Share Option Grant Agreement between Chai Pay SG PTE. LTD. and Myung Aaron Hong	8/3/2022	ECF 125-31		Relevance
D-0375	Document	Employment Agreement between Chai Pay SG PTE. LTD. and Myung Aaron Hong	8/4/2022	ECF 125-30		Relevance
D-0376	Document	Attachment to form TCR, Supplement to TCR ID 16606-717-553-70	8/16/2022	SEC-EMAILS-E-0019010	SEC-EMAILS-E-0019032	Hearsay
D-0377	Document	Tips, Complaints, and Referrals form (TCR ID 16606-717-553-704) submitted to the SEC August 16, 2022	8/16/2022	SEC-EMAILS-E-0018999	SEC-EMAILS-E-0019009	Hearsay
D-0378	Document	Transmission from Daren Firestone to SEC re: HO14164 on behalf of anonymous whistleblower client TCR submission no. 16606-717-553-704	8/26/2022	EPROD-SEC-DEF-1615285	EPROD-SEC-DEF-1615285	Hearsay
D-0379(A)	Document	Letter to Terraform Labs Pte. Ltd. from FINMA. - German	2/22/2023			Hearsay Relevance
D-0379(B)	Document	Letter to Terraform Labs Pte. Ltd. from FINMA. - English				Hearsay Relevance
D-0380	Document	Attachment to form TCR, Supplement to TCR ID 16606-717-553-70	3/7/2023	SEC-EMAILS-E-0018693	SEC-EMAILS-E-0018705	Hearsay
D-0381	Document	Syngnum Bank AG statement of Do Hyeon Kwon	3/20/2023	ECF 125-8		None
D-0382	Document	Settlement Agreement between PortOne SG Pte. Ltd. (f/k/a Chai Pay SG Pte. Ltd.), PortOne Holdings Pte. Ltd. (f/k/a Chai Pay Holding Company Pte. Ltd.), Chai Labs Pte. Ltd., and Myung Aaron Hong	5/19/2023	ECF 125-48		Relevance
D-0383	Document	Excerpt of Transcript of Oral Argument before the Hon. Jed S. Rakoff	6/15/2023	ECF 102-96		Hearsay Relevance
D-0384	Document	Accounting and Corporate Regulatory Authority (ACRA) Business Profile of Terraform Labs Pte. Ltd. (201813807M)	6/19/2023	ECF 102-1		None
D-0385	Document	Data produced by Dr. Matthew J. Edman in support of his Corrected Expert Report, September 19, 2023	9/19/2023			None
D-0386	Document	Exhibit 75 to Corrected Expert Report of Dr. Matthew J. Edman	9/19/2023	ECF 125-31		None
D-0387	Document	SEC's Responses and Objections to Defendants' Requests for Admission	10/10/2023	ECF 102-70		None
D-0388	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0389	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0390	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0391	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0392(A)	Document	TFL financial records reflecting Chai KRT transactions, 2019 - 2021	2019 to 2021	TFL_SEC_00215928		Hearsay Foundation Authenticity
D-0392(B)	Document	TFL financial records reflecting Chai KRT transactions and certified translation, 2019 - 2021	2019 to 2021	TFL_SEC_00215928		Hearsay Foundation Authenticity
D-0393	Document	Terra topup and settlement transaction history from settlement.chai.finance from 3/18/2021 to 3/18/2022	3/18/2021 to 3/18/2022			Authenticity
D-0394	Document	TFL topup transaction and settlement records 4/22/2021 to 12/22/2021	4/22/2021 to 12/22/2021	TFL_SEC_00225579	TFL_SEC_00225579	Hearsay Foundation Authenticity
D-0395	Document	Chai Summary for Chai Equity Fundraise	n.d.	ECF 125-67		Hearsay Foundation Authenticity

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0396	Document	columbus-1-data.tar.1z4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-1-data.tar.1z4">https://d12.quicksync.io/columbus-1-data.tar.1z4</a>	n.d.			None
D-0397	Document	columbus-2-data.tar.1z4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-2-data.tar.1z4">https://d12.quicksync.io/columbus-2-data.tar.1z4</a>	n.d.			None
D-0398	Document	columbus-3-archive.20201003.1750.tar.1z4, QuickSync.io, <a href="http://d12.quicksync.io/columbus-3-archive.20201003.1750.tar.1z4">http://d12.quicksync.io/columbus-3-archive.20201003.1750.tar.1z4</a>	n.d.			None
D-0399	Document	columbus-5-archive.20220830.1141.tar.1z4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-5-archive.20220830.1141.tar.1z4">https://d12.quicksync.io/columbus-5-archive.20220830.1141.tar.1z4</a>	n.d.			None
D-0400	Document	GitHub terra-money-lp-server.bundle file	n.d.	SEC-GITHUB-E-0000300	SEC-GITHUB-E-0000300	None
D-0401	Document	GitHub terra-money-lp-watcher.bundle file	n.d.	SEC-GITHUB-E-0000301	SEC-GITHUB-E-0000301	None
D-0402	Document	GitHub terra-money-lp-topup.bundle file	n.d.	SEC-GITHUB-E-0000384	SEC-GITHUB-E-0000384	None
D-0403	Document	KRT/KRW Trading Records for TFL and Chai pts. 1 through 6	n.d.	TFL_SEC_00215928; ECF 125-21		Hearsay Foundation Authenticity
D-0404	Document	List of Chai Merchant Wallets	n.d.	ECF 125-75		None
D-0405(A)	Document	lp_server_main_korean	n.d.			Authenticity
D-0405(B)	Document	Official Korean to English Translation of lp_server_main_korean	n.d.			Authenticity
D-0406	Document	Columbus-4-archive.20211012.0622.tar.1z4, QuickSync.io, <a href="https://d12.quicksync.io/columbus-4-archive.20211012.0622.tar.1z4">https://d12.quicksync.io/columbus-4-archive.20211012.0622.tar.1z4</a>	n.d.			None
D-0407	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a> terra1e82da9n6jz442ch0wn5lur6hdmf7jyq8sufkp, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	n.d.			None
D-0408	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a> terra1wqwfwh797h77e2xpy9xx082pwpxxlm9x4xws, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	n.d.			None
D-0409	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a> terra1fex9f78rcuwfhsnc8su6mz8rl9zwhq03fhwf3, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>	n.d.			None
D-0410	Document	Terra Deep Dive (PowerPoint)	n.d.	TFL_SEC_00252625	TFL_SEC_00252649	Hearsay
D-0411	Document	Terra Stability Mechanism Deep Dive (PowerPoint)	n.d.	TFL_SEC_00202157	TFL_SEC_00202203	Hearsay
D-0412	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0413	Document	5/23/2021 Slack conversation ops-comms	5/23/2021	TFL_SEC_00237650	TFL_SEC_00237651	Hearsay
D-0414	Document	"Anchor Messaging & Marketing Working Doc", Targeted Product Messaging - Anchor - "Stripe for Savings"		SEC-CurranB-E-0028136	SEC-CurranB-E-0028138	Hearsay
D-0415	Document	Code received from Galois		TFL_SEC_00354119	TFL_SEC_00354140	Hearsay Relevance Authenticity Foundation
D-0416	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a> terra14l46jrdgdhaw4cejukx50ndp0hss95ekt2kfmw, where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None



Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0417	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">terra1dvghtnsqr6eusxxhqcmmuhwmpw26r2ze8kgap823</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-0418	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">terra1luagdjcr9c9yvp3ak4d7chjm5gldcmgn5rku5</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-0419	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">terra1ncjg4a59x2pgvqy9qjyqprj8trwshm0wieht5</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-0420	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">terra1rvxcszyfcrt2v3a7md8p30hvu39kj6xf48w9c</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-0421	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">terra1x04xgtwiw72gtfzrq7nfwmr6eexla8ecjw28z</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-0422	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <a href="https://finder.terra.money/classic/">terra1ywl73n563gpdch7dnqx79j3v9hhj2fayct8e</a> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-0423	Document	Chai Corporation: Introduction slide deck		TFL_SEC_00203348	TFL_SEC_00203360	Hearsay Foundation
D-0424	Document	Chai Microservices diagram from Myung Deposition		ZFZ_000840		Hearsay and foundation unless used with Myung
D-0425	Document	Chai Valuation Model Showing Seigniorage valued in KRW		ECF 125-55		Hearsay Foundation Authenticity
D-0426	Document	ChaiScan	n.d.	SEC-KFSC-E-0000377		None
D-0427	Document	Cover sheet for video of Signal messages between D. Kwon and President of U.S. Trading Firm		JUMP0024348; ECF 102-60	JUMP0024348	None
D-0428	Document	CV of Dr. Matthew J. Edman		ECF 102-84		None
D-0429	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0430	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0431	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-0432	Document	FTX Third-Party Production - CSV		TFL_SEC_00348522	TFL_SEC_00348522	Hearsay Relevance
D-0433	Document	FTX Third-Party Production - CSV		TFL_SEC_00348523	TFL_SEC_00348523	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0434	Document	FTX Third-Party Production - CSV		TFL_SEC_00348524	TFL_SEC_00348524	Hearsay Relevance
D-0435	Document	FTX Third-Party Production - CSV		TFL_SEC_00348525	TFL_SEC_00348525	Hearsay Relevance
D-0436	Document	FTX Third-Party Production - CSV		TFL_SEC_00348526	TFL_SEC_00348526	Hearsay Relevance
D-0437	Document	FTX Third-Party Production - CSV		TFL_SEC_00348527	TFL_SEC_00348527	Hearsay Relevance
D-0438	Document	FTX Third-Party Production - CSV		TFL_SEC_00348528	TFL_SEC_00348528	Hearsay Relevance
D-0439	Document	FTX Third-Party Production - CSV		TFL_SEC_00348529	TFL_SEC_00348529	Hearsay Relevance
D-0440	Document	FTX Third-Party Production - CSV		TFL_SEC_00348530	TFL_SEC_00348530	Hearsay Relevance
D-0441	Document	FTX Third-Party Production - CSV		TFL_SEC_00348531	TFL_SEC_00348531	Hearsay Relevance
D-0442	Document	FTX Third-Party Production - CSV		TFL_SEC_00348532	TFL_SEC_00348532	Hearsay Relevance
D-0443	Document	FTX Third-Party Production - CSV		TFL_SEC_00348533	TFL_SEC_00348533	Hearsay Relevance
D-0444	Document	FTX Third-Party Production - CSV		TFL_SEC_00348534	TFL_SEC_00348534	Hearsay Relevance
D-0445	Document	FTX Third-Party Production - CSV		TFL_SEC_00348535	TFL_SEC_00348535	Hearsay Relevance
D-0446	Document	FTX Third-Party Production - CSV		TFL_SEC_00348536	TFL_SEC_00348536	Hearsay Relevance
D-0447	Document	FTX Third-Party Production - CSV		TFL_SEC_00348537	TFL_SEC_00348537	Hearsay Relevance
D-0448	Document	FTX Third-Party Production - CSV		TFL_SEC_00348538	TFL_SEC_00348538	Hearsay Relevance
D-0449	Document	FTX Third-Party Production - CSV		TFL_SEC_00348539	TFL_SEC_00348539	Hearsay Relevance
D-0450	Document	FTX Third-Party Production - CSV		TFL_SEC_00348540	TFL_SEC_00348540	Hearsay Relevance
D-0451	Document	FTX Third-Party Production - CSV		TFL_SEC_00348541	TFL_SEC_00348541	Hearsay Relevance
D-0452	Document	FTX Third-Party Production - CSV		TFL_SEC_00348542	TFL_SEC_00348542	Hearsay Relevance
D-0453	Document	FTX Third-Party Production - CSV		TFL_SEC_00348543	TFL_SEC_00348543	Hearsay Relevance
D-0454	Document	FTX Third-Party Production - CSV		TFL_SEC_00348544	TFL_SEC_00348544	Hearsay Relevance
D-0455	Document	FTX Third-Party Production - CSV		TFL_SEC_00348545	TFL_SEC_00348545	Hearsay Relevance
D-0456	Document	FTX Third-Party Production - CSV		TFL_SEC_00348546	TFL_SEC_00348546	Hearsay Relevance
D-0457	Document	FTX Third-Party Production - CSV		TFL_SEC_00348547	TFL_SEC_00348547	Hearsay Relevance
D-0458	Document	FTX Third-Party Production - CSV		TFL_SEC_00348548	TFL_SEC_00348548	Hearsay Relevance
D-0459	Document	FTX Third-Party Production - CSV		TFL_SEC_00348549	TFL_SEC_00348549	Hearsay Relevance
D-0460	Document	FTX Third-Party Production - CSV		TFL_SEC_00348550	TFL_SEC_00348550	Hearsay Relevance
D-0461	Document	FTX Third-Party Production - CSV		TFL_SEC_00348551	TFL_SEC_00348551	Hearsay Relevance
D-0462	Document	FTX Third-Party Production - CSV		TFL_SEC_00348552	TFL_SEC_00348552	Hearsay Relevance
D-0463	Document	FTX Third-Party Production - CSV		TFL_SEC_00348553	TFL_SEC_00348553	Hearsay Relevance
D-0464	Document	FTX Third-Party Production - CSV		TFL_SEC_00348554	TFL_SEC_00348554	Hearsay Relevance
D-0465	Document	FTX Third-Party Production - CSV		TFL_SEC_00348555	TFL_SEC_00348555	Hearsay Relevance
D-0466	Document	FTX Third-Party Production - CSV		TFL_SEC_00348556	TFL_SEC_00348556	Hearsay Relevance
D-0467	Document	FTX Third-Party Production - CSV		TFL_SEC_00348557	TFL_SEC_00348557	Hearsay Relevance
D-0468	Document	FTX Third-Party Production - CSV		TFL_SEC_00348558	TFL_SEC_00348558	Hearsay Relevance
D-0469	Document	FTX Third-Party Production - CSV		TFL_SEC_00348559	TFL_SEC_00348559	Hearsay Relevance
D-0470	Document	FTX Third-Party Production - CSV		TFL_SEC_00348560	TFL_SEC_00348560	Hearsay Relevance
D-0471	Document	FTX Third-Party Production - CSV		TFL_SEC_00348561	TFL_SEC_00348561	Hearsay Relevance
D-0472	Document	FTX Third-Party Production - CSV		TFL_SEC_00348562	TFL_SEC_00348562	Hearsay Relevance
D-0473	Document	FTX Third-Party Production - CSV		TFL_SEC_00348563	TFL_SEC_00348563	Hearsay Relevance
D-0474	Document	FTX Third-Party Production - CSV		TFL_SEC_00348564	TFL_SEC_00348564	Hearsay Relevance



## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0475	Document	FTX Third-Party Production - CSV		TFL_SEC_00348565	TFL_SEC_00348565	Hearsay Relevance
D-0476	Document	FTX Third-Party Production - CSV		TFL_SEC_00348566	TFL_SEC_00348566	Hearsay Relevance
D-0477	Document	FTX Third-Party Production - CSV		TFL_SEC_00348567	TFL_SEC_00348567	Hearsay Relevance
D-0478	Document	FTX Third-Party Production - CSV		TFL_SEC_00348568	TFL_SEC_00348568	Hearsay Relevance
D-0479	Document	FTX Third-Party Production - CSV		TFL_SEC_00348569	TFL_SEC_00348569	Hearsay Relevance
D-0480	Document	FTX Third-Party Production - CSV		TFL_SEC_00348570	TFL_SEC_00348570	Hearsay Relevance
D-0481	Document	FTX Third-Party Production - CSV		TFL_SEC_00348571	TFL_SEC_00348571	Hearsay Relevance
D-0482	Document	FTX Third-Party Production - CSV		TFL_SEC_00348572	TFL_SEC_00348572	Hearsay Relevance
D-0483	Document	FTX Third-Party Production - CSV		TFL_SEC_00348573	TFL_SEC_00348573	Hearsay Relevance
D-0484	Document	FTX Third-Party Production - CSV		TFL_SEC_00348574	TFL_SEC_00348574	Hearsay Relevance
D-0485	Document	FTX Third-Party Production - CSV		TFL_SEC_00348575	TFL_SEC_00348575	Hearsay Relevance
D-0486	Document	FTX Third-Party Production - CSV		TFL_SEC_00348576	TFL_SEC_00348576	Hearsay Relevance
D-0487	Document	FTX Third-Party Production - CSV		TFL_SEC_00348577	TFL_SEC_00348577	Hearsay Relevance
D-0488	Document	FTX Third-Party Production - CSV		TFL_SEC_00348578	TFL_SEC_00348578	Hearsay Relevance
D-0489	Document	FTX Third-Party Production - CSV		TFL_SEC_00348579	TFL_SEC_00348579	Hearsay Relevance
D-0490	Document	FTX Third-Party Production - CSV		TFL_SEC_00348580	TFL_SEC_00348580	Hearsay Relevance
D-0491	Document	FTX Third-Party Production - CSV		TFL_SEC_00348581	TFL_SEC_00348581	Hearsay Relevance
D-0492	Document	FTX Third-Party Production - CSV		TFL_SEC_00348582	TFL_SEC_00348582	Hearsay Relevance
D-0493	Document	FTX Third-Party Production - CSV		TFL_SEC_00348583	TFL_SEC_00348583	Hearsay Relevance
D-0494	Document	FTX Third-Party Production - CSV		TFL_SEC_00348584	TFL_SEC_00348584	Hearsay Relevance
D-0495	Document	FTX Third-Party Production - CSV		TFL_SEC_00348585	TFL_SEC_00348585	Hearsay Relevance
D-0496	Document	FTX Third-Party Production - CSV		TFL_SEC_00348586	TFL_SEC_00348586	Hearsay Relevance
D-0497	Document	FTX Third-Party Production - CSV		TFL_SEC_00348587	TFL_SEC_00348587	Hearsay Relevance
D-0498	Document	FTX Third-Party Production - CSV		TFL_SEC_00348588	TFL_SEC_00348588	Hearsay Relevance
D-0499	Document	FTX Third-Party Production - CSV		TFL_SEC_00348589	TFL_SEC_00348589	Hearsay Relevance
D-0500	Document	FTX Third-Party Production - CSV		TFL_SEC_00348590	TFL_SEC_00348590	Hearsay Relevance
D-0501	Document	FTX Third-Party Production - CSV		TFL_SEC_00348591	TFL_SEC_00348591	Hearsay Relevance
D-0502	Document	FTX Third-Party Production - CSV		TFL_SEC_00348592	TFL_SEC_00348592	Hearsay Relevance
D-0503	Document	FTX Third-Party Production - CSV		TFL_SEC_00348593	TFL_SEC_00348593	Hearsay Relevance
D-0504	Document	FTX Third-Party Production - CSV		TFL_SEC_00348594	TFL_SEC_00348594	Hearsay Relevance
D-0505	Document	FTX Third-Party Production - CSV		TFL_SEC_00348595	TFL_SEC_00348595	Hearsay Relevance
D-0506	Document	FTX Third-Party Production - CSV		TFL_SEC_00348596	TFL_SEC_00348596	Hearsay Relevance
D-0507	Document	FTX Third-Party Production - CSV		TFL_SEC_00348597	TFL_SEC_00348597	Hearsay Relevance
D-0508	Document	FTX Third-Party Production - CSV		TFL_SEC_00348598	TFL_SEC_00348598	Hearsay Relevance
D-0509	Document	FTX Third-Party Production - CSV		TFL_SEC_00348599	TFL_SEC_00348599	Hearsay Relevance
D-0510	Document	FTX Third-Party Production - CSV		TFL_SEC_00348600	TFL_SEC_00348600	Hearsay Relevance
D-0511	Document	FTX Third-Party Production - CSV		TFL_SEC_00348601	TFL_SEC_00348601	Hearsay Relevance
D-0512	Document	FTX Third-Party Production - CSV		TFL_SEC_00348602	TFL_SEC_00348602	Hearsay Relevance
D-0513	Document	FTX Third-Party Production - CSV		TFL_SEC_00348603	TFL_SEC_00348603	Hearsay Relevance
D-0514	Document	FTX Third-Party Production - CSV		TFL_SEC_00348604	TFL_SEC_00348604	Hearsay Relevance
D-0515	Document	FTX Third-Party Production - CSV		TFL_SEC_00348605	TFL_SEC_00348605	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0516	Document	FTX Third-Party Production - CSV		TFL_SEC_00348606	TFL_SEC_00348606	Hearsay Relevance
D-0517	Document	FTX Third-Party Production - CSV		TFL_SEC_00348607	TFL_SEC_00348607	Hearsay Relevance
D-0518	Document	FTX Third-Party Production - CSV		TFL_SEC_00348608	TFL_SEC_00348608	Hearsay Relevance
D-0519	Document	FTX Third-Party Production - CSV		TFL_SEC_00348609	TFL_SEC_00348609	Hearsay Relevance
D-0520	Document	FTX Third-Party Production - CSV		TFL_SEC_00348610	TFL_SEC_00348610	Hearsay Relevance
D-0521	Document	FTX Third-Party Production - CSV		TFL_SEC_00348611	TFL_SEC_00348611	Hearsay Relevance
D-0522	Document	FTX Third-Party Production - CSV		TFL_SEC_00348612	TFL_SEC_00348612	Hearsay Relevance
D-0523	Document	FTX Third-Party Production - CSV		TFL_SEC_00348613	TFL_SEC_00348613	Hearsay Relevance
D-0524	Document	FTX Third-Party Production - CSV		TFL_SEC_00348614	TFL_SEC_00348614	Hearsay Relevance
D-0525	Document	FTX Third-Party Production - CSV		TFL_SEC_00348615	TFL_SEC_00348615	Hearsay Relevance
D-0526	Document	FTX Third-Party Production - CSV		TFL_SEC_00348616	TFL_SEC_00348616	Hearsay Relevance
D-0527	Document	FTX Third-Party Production - CSV		TFL_SEC_00348617	TFL_SEC_00348617	Hearsay Relevance
D-0528	Document	FTX Third-Party Production - CSV		TFL_SEC_00348618	TFL_SEC_00348618	Hearsay Relevance
D-0529	Document	FTX Third-Party Production - CSV		TFL_SEC_00348619	TFL_SEC_00348619	Hearsay Relevance
D-0530	Document	FTX Third-Party Production - CSV		TFL_SEC_00348620	TFL_SEC_00348620	Hearsay Relevance
D-0531	Document	FTX Third-Party Production - CSV		TFL_SEC_00348621	TFL_SEC_00348621	Hearsay Relevance
D-0532	Document	FTX Third-Party Production - CSV		TFL_SEC_00348622	TFL_SEC_00348622	Hearsay Relevance
D-0533	Document	FTX Third-Party Production - CSV		TFL_SEC_00348623	TFL_SEC_00348623	Hearsay Relevance
D-0534	Document	FTX Third-Party Production - CSV		TFL_SEC_00348624	TFL_SEC_00348624	Hearsay Relevance
D-0535	Document	FTX Third-Party Production - CSV		TFL_SEC_00348625	TFL_SEC_00348625	Hearsay Relevance
D-0536	Document	FTX Third-Party Production - CSV		TFL_SEC_00348626	TFL_SEC_00348626	Hearsay Relevance
D-0537	Document	FTX Third-Party Production - CSV		TFL_SEC_00348627	TFL_SEC_00348627	Hearsay Relevance
D-0538	Document	FTX Third-Party Production - CSV		TFL_SEC_00348628	TFL_SEC_00348628	Hearsay Relevance
D-0539	Document	FTX Third-Party Production - CSV		TFL_SEC_00348629	TFL_SEC_00348629	Hearsay Relevance
D-0540	Document	FTX Third-Party Production - CSV		TFL_SEC_00348630	TFL_SEC_00348630	Hearsay Relevance
D-0541	Document	FTX Third-Party Production - CSV		TFL_SEC_00348631	TFL_SEC_00348631	Hearsay Relevance
D-0542	Document	FTX Third-Party Production - CSV		TFL_SEC_00348632	TFL_SEC_00348632	Hearsay Relevance
D-0543	Document	FTX Third-Party Production - CSV		TFL_SEC_00348633	TFL_SEC_00348633	Hearsay Relevance
D-0544	Document	FTX Third-Party Production - CSV		TFL_SEC_00348634	TFL_SEC_00348634	Hearsay Relevance
D-0545	Document	FTX Third-Party Production - CSV		TFL_SEC_00348635	TFL_SEC_00348635	Hearsay Relevance
D-0546	Document	FTX Third-Party Production - CSV		TFL_SEC_00348636	TFL_SEC_00348636	Hearsay Relevance
D-0547	Document	FTX Third-Party Production - CSV		TFL_SEC_00348637	TFL_SEC_00348637	Hearsay Relevance
D-0548	Document	FTX Third-Party Production - CSV		TFL_SEC_00348638	TFL_SEC_00348638	Hearsay Relevance
D-0549	Document	FTX Third-Party Production - CSV		TFL_SEC_00348639	TFL_SEC_00348639	Hearsay Relevance
D-0550	Document	FTX Third-Party Production - CSV		TFL_SEC_00348640	TFL_SEC_00348640	Hearsay Relevance
D-0551	Document	FTX Third-Party Production - CSV		TFL_SEC_00348641	TFL_SEC_00348641	Hearsay Relevance
D-0552	Document	FTX Third-Party Production - CSV		TFL_SEC_00348642	TFL_SEC_00348642	Hearsay Relevance
D-0553	Document	FTX Third-Party Production - CSV		TFL_SEC_00348643	TFL_SEC_00348643	Hearsay Relevance
D-0554	Document	FTX Third-Party Production - CSV		TFL_SEC_00348644	TFL_SEC_00348644	Hearsay Relevance
D-0555	Document	FTX Third-Party Production - CSV		TFL_SEC_00348645	TFL_SEC_00348645	Hearsay Relevance
D-0556	Document	FTX Third-Party Production - CSV		TFL_SEC_00348646	TFL_SEC_00348646	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0557	Document	FTX Third-Party Production - CSV		TFL_SEC_00348647	TFL_SEC_00348647	Hearsay Relevance
D-0558	Document	FTX Third-Party Production - CSV		TFL_SEC_00348648	TFL_SEC_00348648	Hearsay Relevance
D-0559	Document	FTX Third-Party Production - CSV		TFL_SEC_00348649	TFL_SEC_00348649	Hearsay Relevance
D-0560	Document	FTX Third-Party Production - CSV		TFL_SEC_00348650	TFL_SEC_00348650	Hearsay Relevance
D-0561	Document	FTX Third-Party Production - CSV		TFL_SEC_00348651	TFL_SEC_00348651	Hearsay Relevance
D-0562	Document	FTX Third-Party Production - CSV		TFL_SEC_00348652	TFL_SEC_00348652	Hearsay Relevance
D-0563	Document	FTX Third-Party Production - CSV		TFL_SEC_00348653	TFL_SEC_00348653	Hearsay Relevance
D-0564	Document	FTX Third-Party Production - CSV		TFL_SEC_00348654	TFL_SEC_00348654	Hearsay Relevance
D-0565	Document	FTX Third-Party Production - CSV		TFL_SEC_00348655	TFL_SEC_00348655	Hearsay Relevance
D-0566	Document	FTX Third-Party Production - CSV		TFL_SEC_00348656	TFL_SEC_00348656	Hearsay Relevance
D-0567	Document	FTX Third-Party Production - CSV		TFL_SEC_00348657	TFL_SEC_00348657	Hearsay Relevance
D-0568	Document	FTX Third-Party Production - CSV		TFL_SEC_00348658	TFL_SEC_00348658	Hearsay Relevance
D-0569	Document	FTX Third-Party Production - CSV		TFL_SEC_00348659	TFL_SEC_00348659	Hearsay Relevance
D-0570	Document	FTX Third-Party Production - CSV		TFL_SEC_00348660	TFL_SEC_00348660	Hearsay Relevance
D-0571	Document	FTX Third-Party Production - CSV		TFL_SEC_00348661	TFL_SEC_00348661	Hearsay Relevance
D-0572	Document	FTX Third-Party Production - CSV		TFL_SEC_00348662	TFL_SEC_00348662	Hearsay Relevance
D-0573	Document	FTX Third-Party Production - CSV		TFL_SEC_00348663	TFL_SEC_00348663	Hearsay Relevance
D-0574	Document	FTX Third-Party Production - CSV		TFL_SEC_00348664	TFL_SEC_00348664	Hearsay Relevance
D-0575	Document	FTX Third-Party Production - CSV		TFL_SEC_00348665	TFL_SEC_00348665	Hearsay Relevance
D-0576	Document	FTX Third-Party Production - CSV		TFL_SEC_00348666	TFL_SEC_00348666	Hearsay Relevance
D-0577	Document	FTX Third-Party Production - CSV		TFL_SEC_00348667	TFL_SEC_00348667	Hearsay Relevance
D-0578	Document	FTX Third-Party Production - CSV		TFL_SEC_00348668	TFL_SEC_00348668	Hearsay Relevance
D-0579	Document	FTX Third-Party Production - CSV		TFL_SEC_00348669	TFL_SEC_00348669	Hearsay Relevance
D-0580	Document	FTX Third-Party Production - CSV		TFL_SEC_00348670	TFL_SEC_00348670	Hearsay Relevance
D-0581	Document	FTX Third-Party Production - CSV		TFL_SEC_00348671	TFL_SEC_00348671	Hearsay Relevance
D-0582	Document	FTX Third-Party Production - CSV		TFL_SEC_00348672	TFL_SEC_00348672	Hearsay Relevance
D-0583	Document	FTX Third-Party Production - CSV		TFL_SEC_00348673	TFL_SEC_00348673	Hearsay Relevance
D-0584	Document	FTX Third-Party Production - CSV		TFL_SEC_00348674	TFL_SEC_00348674	Hearsay Relevance
D-0585	Document	FTX Third-Party Production - CSV		TFL_SEC_00348675	TFL_SEC_00348675	Hearsay Relevance
D-0586	Document	FTX Third-Party Production - CSV		TFL_SEC_00348676	TFL_SEC_00348676	Hearsay Relevance
D-0587	Document	FTX Third-Party Production - CSV		TFL_SEC_00348677	TFL_SEC_00348677	Hearsay Relevance
D-0588	Document	FTX Third-Party Production - CSV		TFL_SEC_00348678	TFL_SEC_00348678	Hearsay Relevance
D-0589	Document	FTX Third-Party Production - CSV		TFL_SEC_00348679	TFL_SEC_00348679	Hearsay Relevance
D-0590	Document	FTX Third-Party Production - CSV		TFL_SEC_00348680	TFL_SEC_00348680	Hearsay Relevance
D-0591	Document	FTX Third-Party Production - CSV		TFL_SEC_00348681	TFL_SEC_00348681	Hearsay Relevance
D-0592	Document	FTX Third-Party Production - CSV		TFL_SEC_00348682	TFL_SEC_00348682	Hearsay Relevance
D-0593	Document	FTX Third-Party Production - CSV		TFL_SEC_00348683	TFL_SEC_00348683	Hearsay Relevance
D-0594	Document	FTX Third-Party Production - CSV		TFL_SEC_00348684	TFL_SEC_00348684	Hearsay Relevance
D-0595	Document	FTX Third-Party Production - CSV		TFL_SEC_00348685	TFL_SEC_00348685	Hearsay Relevance
D-0596	Document	FTX Third-Party Production - CSV		TFL_SEC_00348686	TFL_SEC_00348686	Hearsay Relevance
D-0597	Document	FTX Third-Party Production - CSV		TFL_SEC_00348687	TFL_SEC_00348687	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0598	Document	FTX Third-Party Production - CSV		TFL_SEC_00348688	TFL_SEC_00348688	Hearsay Relevance
D-0599	Document	FTX Third-Party Production - CSV		TFL_SEC_00348689	TFL_SEC_00348689	Hearsay Relevance
D-0600	Document	FTX Third-Party Production - CSV		TFL_SEC_00348690	TFL_SEC_00348690	Hearsay Relevance
D-0601	Document	FTX Third-Party Production - CSV		TFL_SEC_00348691	TFL_SEC_00348691	Hearsay Relevance
D-0602	Document	FTX Third-Party Production - CSV		TFL_SEC_00348692	TFL_SEC_00348692	Hearsay Relevance
D-0603	Document	FTX Third-Party Production - CSV		TFL_SEC_00348693	TFL_SEC_00348693	Hearsay Relevance
D-0604	Document	FTX Third-Party Production - CSV		TFL_SEC_00348694	TFL_SEC_00348694	Hearsay Relevance
D-0605	Document	FTX Third-Party Production - CSV		TFL_SEC_00348695	TFL_SEC_00348695	Hearsay Relevance
D-0606	Document	FTX Third-Party Production - CSV		TFL_SEC_00348696	TFL_SEC_00348696	Hearsay Relevance
D-0607	Document	FTX Third-Party Production - CSV		TFL_SEC_00348697	TFL_SEC_00348697	Hearsay Relevance
D-0608	Document	FTX Third-Party Production - CSV		TFL_SEC_00348698	TFL_SEC_00348698	Hearsay Relevance
D-0609	Document	FTX Third-Party Production - CSV		TFL_SEC_00348699	TFL_SEC_00348699	Hearsay Relevance
D-0610	Document	FTX Third-Party Production - CSV		TFL_SEC_00348700	TFL_SEC_00348700	Hearsay Relevance
D-0611	Document	FTX Third-Party Production - CSV		TFL_SEC_00348701	TFL_SEC_00348701	Hearsay Relevance
D-0612	Document	FTX Third-Party Production - CSV		TFL_SEC_00348702	TFL_SEC_00348702	Hearsay Relevance
D-0613	Document	FTX Third-Party Production - CSV		TFL_SEC_00348703	TFL_SEC_00348703	Hearsay Relevance
D-0614	Document	FTX Third-Party Production - CSV		TFL_SEC_00348704	TFL_SEC_00348704	Hearsay Relevance
D-0615	Document	FTX Third-Party Production - CSV		TFL_SEC_00348705	TFL_SEC_00348705	Hearsay Relevance
D-0616	Document	FTX Third-Party Production - CSV		TFL_SEC_00348706	TFL_SEC_00348706	Hearsay Relevance
D-0617	Document	FTX Third-Party Production - CSV		TFL_SEC_00348707	TFL_SEC_00348707	Hearsay Relevance
D-0618	Document	FTX Third-Party Production - CSV		TFL_SEC_00348708	TFL_SEC_00348708	Hearsay Relevance
D-0619	Document	FTX Third-Party Production - CSV		TFL_SEC_00348709	TFL_SEC_00348709	Hearsay Relevance
D-0620	Document	FTX Third-Party Production - CSV		TFL_SEC_00348710	TFL_SEC_00348710	Hearsay Relevance
D-0621	Document	FTX Third-Party Production - CSV		TFL_SEC_00348711	TFL_SEC_00348711	Hearsay Relevance
D-0622	Document	FTX Third-Party Production - CSV		TFL_SEC_00348712	TFL_SEC_00348712	Hearsay Relevance
D-0623	Document	FTX Third-Party Production - CSV		TFL_SEC_00348713	TFL_SEC_00348713	Hearsay Relevance
D-0624	Document	FTX Third-Party Production - CSV		TFL_SEC_00348714	TFL_SEC_00348714	Hearsay Relevance
D-0625	Document	FTX Third-Party Production - CSV		TFL_SEC_00348715	TFL_SEC_00348715	Hearsay Relevance
D-0626	Document	FTX Third-Party Production - CSV		TFL_SEC_00348716	TFL_SEC_00348716	Hearsay Relevance
D-0627	Document	FTX Third-Party Production - CSV		TFL_SEC_00348717	TFL_SEC_00348717	Hearsay Relevance
D-0628	Document	FTX Third-Party Production - CSV		TFL_SEC_00348718	TFL_SEC_00348718	Hearsay Relevance
D-0629	Document	FTX Third-Party Production - CSV		TFL_SEC_00348719	TFL_SEC_00348719	Hearsay Relevance
D-0630	Document	FTX Third-Party Production - CSV		TFL_SEC_00348720	TFL_SEC_00348720	Hearsay Relevance
D-0631	Document	FTX Third-Party Production - CSV		TFL_SEC_00348721	TFL_SEC_00348721	Hearsay Relevance
D-0632	Document	FTX Third-Party Production - CSV		TFL_SEC_00348722	TFL_SEC_00348722	Hearsay Relevance
D-0633	Document	FTX Third-Party Production - CSV		TFL_SEC_00348723	TFL_SEC_00348723	Hearsay Relevance
D-0634	Document	FTX Third-Party Production - CSV		TFL_SEC_00348724	TFL_SEC_00348724	Hearsay Relevance
D-0635	Document	FTX Third-Party Production - CSV		TFL_SEC_00348725	TFL_SEC_00348725	Hearsay Relevance
D-0636	Document	FTX Third-Party Production - CSV		TFL_SEC_00348726	TFL_SEC_00348726	Hearsay Relevance
D-0637	Document	FTX Third-Party Production - CSV		TFL_SEC_00348727	TFL_SEC_00348727	Hearsay Relevance
D-0638	Document	FTX Third-Party Production - CSV		TFL_SEC_00348728	TFL_SEC_00348728	Hearsay Relevance



## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0639	Document	FTX Third-Party Production - CSV		TFL_SEC_00348729	TFL_SEC_00348729	Hearsay Relevance
D-0640	Document	FTX Third-Party Production - CSV		TFL_SEC_00348730	TFL_SEC_00348730	Hearsay Relevance
D-0641	Document	FTX Third-Party Production - CSV		TFL_SEC_00348731	TFL_SEC_00348731	Hearsay Relevance
D-0642	Document	FTX Third-Party Production - CSV		TFL_SEC_00348732	TFL_SEC_00348732	Hearsay Relevance
D-0643	Document	FTX Third-Party Production - CSV		TFL_SEC_00348733	TFL_SEC_00348733	Hearsay Relevance
D-0644	Document	FTX Third-Party Production - CSV		TFL_SEC_00348734	TFL_SEC_00348734	Hearsay Relevance
D-0645	Document	FTX Third-Party Production - CSV		TFL_SEC_00348735	TFL_SEC_00348735	Hearsay Relevance
D-0646	Document	FTX Third-Party Production - CSV		TFL_SEC_00348736	TFL_SEC_00348736	Hearsay Relevance
D-0647	Document	FTX Third-Party Production - CSV		TFL_SEC_00348737	TFL_SEC_00348737	Hearsay Relevance
D-0648	Document	FTX Third-Party Production - CSV		TFL_SEC_00348738	TFL_SEC_00348738	Hearsay Relevance
D-0649	Document	FTX Third-Party Production - CSV		TFL_SEC_00348739	TFL_SEC_00348739	Hearsay Relevance
D-0650	Document	FTX Third-Party Production - CSV		TFL_SEC_00348740	TFL_SEC_00348740	Hearsay Relevance
D-0651	Document	FTX Third-Party Production - CSV		TFL_SEC_00348741	TFL_SEC_00348741	Hearsay Relevance
D-0652	Document	FTX Third-Party Production - CSV		TFL_SEC_00348742	TFL_SEC_00348742	Hearsay Relevance
D-0653	Document	FTX Third-Party Production - CSV		TFL_SEC_00348743	TFL_SEC_00348743	Hearsay Relevance
D-0654	Document	FTX Third-Party Production - CSV		TFL_SEC_00348744	TFL_SEC_00348744	Hearsay Relevance
D-0655	Document	FTX Third-Party Production - CSV		TFL_SEC_00348745	TFL_SEC_00348745	Hearsay Relevance
D-0656	Document	FTX Third-Party Production - CSV		TFL_SEC_00348746	TFL_SEC_00348746	Hearsay Relevance
D-0657	Document	FTX Third-Party Production - CSV		TFL_SEC_00348747	TFL_SEC_00348747	Hearsay Relevance
D-0658	Document	FTX Third-Party Production - CSV		TFL_SEC_00348748	TFL_SEC_00348748	Hearsay Relevance
D-0659	Document	FTX Third-Party Production - CSV		TFL_SEC_00348749	TFL_SEC_00348749	Hearsay Relevance
D-0660	Document	FTX Third-Party Production - CSV		TFL_SEC_00348750	TFL_SEC_00348750	Hearsay Relevance
D-0661	Document	FTX Third-Party Production - CSV		TFL_SEC_00348751	TFL_SEC_00348751	Hearsay Relevance
D-0662	Document	FTX Third-Party Production - CSV		TFL_SEC_00348752	TFL_SEC_00348752	Hearsay Relevance
D-0663	Document	FTX Third-Party Production - CSV		TFL_SEC_00348753	TFL_SEC_00348753	Hearsay Relevance
D-0664	Document	FTX Third-Party Production - CSV		TFL_SEC_00348754	TFL_SEC_00348754	Hearsay Relevance
D-0665	Document	FTX Third-Party Production - CSV		TFL_SEC_00348755	TFL_SEC_00348755	Hearsay Relevance
D-0666	Document	FTX Third-Party Production - CSV		TFL_SEC_00348756	TFL_SEC_00348756	Hearsay Relevance
D-0667	Document	FTX Third-Party Production - CSV		TFL_SEC_00348757	TFL_SEC_00348757	Hearsay Relevance
D-0668	Document	FTX Third-Party Production - CSV		TFL_SEC_00348758	TFL_SEC_00348758	Hearsay Relevance
D-0669	Document	FTX Third-Party Production - CSV		TFL_SEC_00348759	TFL_SEC_00348759	Hearsay Relevance
D-0670	Document	FTX Third-Party Production - CSV		TFL_SEC_00348760	TFL_SEC_00348760	Hearsay Relevance
D-0671	Document	FTX Third-Party Production - CSV		TFL_SEC_00348761	TFL_SEC_00348761	Hearsay Relevance
D-0672	Document	FTX Third-Party Production - CSV		TFL_SEC_00348762	TFL_SEC_00348762	Hearsay Relevance
D-0673	Document	FTX Third-Party Production - CSV		TFL_SEC_00348763	TFL_SEC_00348763	Hearsay Relevance
D-0674	Document	FTX Third-Party Production - CSV		TFL_SEC_00348764	TFL_SEC_00348764	Hearsay Relevance
D-0675	Document	FTX Third-Party Production - CSV		TFL_SEC_00348765	TFL_SEC_00348765	Hearsay Relevance
D-0676	Document	FTX Third-Party Production - CSV		TFL_SEC_00348766	TFL_SEC_00348766	Hearsay Relevance
D-0677	Document	FTX Third-Party Production - CSV		TFL_SEC_00348767	TFL_SEC_00348767	Hearsay Relevance
D-0678	Document	FTX Third-Party Production - CSV		TFL_SEC_00348768	TFL_SEC_00348768	Hearsay Relevance
D-0679	Document	FTX Third-Party Production - CSV		TFL_SEC_00348769	TFL_SEC_00348769	Hearsay Relevance



## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Req. Bates No.	End. Bates No.	SEC's Objection
D-0680	Document	FTX Third-Party Production - CSV		TFL_SEC_00348770	TFL_SEC_00348770	Hearsay Relevance
D-0681	Document	FTX Third-Party Production - CSV		TFL_SEC_00348771	TFL_SEC_00348771	Hearsay Relevance
D-0682	Document	FTX Third-Party Production - CSV		TFL_SEC_00348772	TFL_SEC_00348772	Hearsay Relevance
D-0683	Document	FTX Third-Party Production - CSV		TFL_SEC_00348773	TFL_SEC_00348773	Hearsay Relevance
D-0684	Document	FTX Third-Party Production - CSV		TFL_SEC_00348774	TFL_SEC_00348774	Hearsay Relevance
D-0685	Document	FTX Third-Party Production - CSV		TFL_SEC_00348775	TFL_SEC_00348775	Hearsay Relevance
D-0686	Document	FTX Third-Party Production - CSV		TFL_SEC_00348776	TFL_SEC_00348776	Hearsay Relevance
D-0687	Document	FTX Third-Party Production - CSV		TFL_SEC_00348777	TFL_SEC_00348777	Hearsay Relevance
D-0688	Document	FTX Third-Party Production - CSV		TFL_SEC_00348778	TFL_SEC_00348778	Hearsay Relevance
D-0689	Document	FTX Third-Party Production - CSV		TFL_SEC_00348779	TFL_SEC_00348779	Hearsay Relevance
D-0690	Document	FTX Third-Party Production - CSV		TFL_SEC_00348780	TFL_SEC_00348780	Hearsay Relevance
D-0691	Document	FTX Third-Party Production - CSV		TFL_SEC_00348781	TFL_SEC_00348781	Hearsay Relevance
D-0692	Document	FTX Third-Party Production - CSV		TFL_SEC_00348782	TFL_SEC_00348782	Hearsay Relevance
D-0693	Document	FTX Third-Party Production - CSV		TFL_SEC_00348783	TFL_SEC_00348783	Hearsay Relevance
D-0694	Document	FTX Third-Party Production - CSV		TFL_SEC_00348784	TFL_SEC_00348784	Hearsay Relevance
D-0695	Document	FTX Third-Party Production - CSV		TFL_SEC_00348785	TFL_SEC_00348785	Hearsay Relevance
D-0696	Document	FTX Third-Party Production - CSV		TFL_SEC_00348786	TFL_SEC_00348786	Hearsay Relevance
D-0697	Document	FTX Third-Party Production - CSV		TFL_SEC_00348787	TFL_SEC_00348787	Hearsay Relevance
D-0698	Document	FTX Third-Party Production - CSV		TFL_SEC_00348788	TFL_SEC_00348788	Hearsay Relevance
D-0699	Document	FTX Third-Party Production - CSV		TFL_SEC_00348789	TFL_SEC_00348789	Hearsay Relevance
D-0700	Document	FTX Third-Party Production - CSV		TFL_SEC_00348790	TFL_SEC_00348790	Hearsay Relevance
D-0701	Document	FTX Third-Party Production - CSV		TFL_SEC_00348791	TFL_SEC_00348791	Hearsay Relevance
D-0702	Document	FTX Third-Party Production - CSV		TFL_SEC_00348792	TFL_SEC_00348792	Hearsay Relevance
D-0703	Document	FTX Third-Party Production - CSV		TFL_SEC_00348793	TFL_SEC_00348793	Hearsay Relevance
D-0704	Document	FTX Third-Party Production - CSV		TFL_SEC_00348794	TFL_SEC_00348794	Hearsay Relevance
D-0705	Document	FTX Third-Party Production - CSV		TFL_SEC_00348795	TFL_SEC_00348795	Hearsay Relevance
D-0706	Document	FTX Third-Party Production - CSV		TFL_SEC_00348796	TFL_SEC_00348796	Hearsay Relevance
D-0707	Document	FTX Third-Party Production - CSV		TFL_SEC_00348797	TFL_SEC_00348797	Hearsay Relevance
D-0708	Document	FTX Third-Party Production - CSV		TFL_SEC_00348798	TFL_SEC_00348798	Hearsay Relevance
D-0709	Document	FTX Third-Party Production - CSV		TFL_SEC_00348799	TFL_SEC_00348799	Hearsay Relevance
D-0710	Document	FTX Third-Party Production - CSV		TFL_SEC_00348800	TFL_SEC_00348800	Hearsay Relevance
D-0711	Document	FTX Third-Party Production - CSV		TFL_SEC_00348801	TFL_SEC_00348801	Hearsay Relevance
D-0712	Document	FTX Third-Party Production - CSV		TFL_SEC_00348802	TFL_SEC_00348802	Hearsay Relevance
D-0713	Document	FTX Third-Party Production - CSV		TFL_SEC_00348803	TFL_SEC_00348803	Hearsay Relevance
D-0714	Document	FTX Third-Party Production - CSV		TFL_SEC_00348804	TFL_SEC_00348804	Hearsay Relevance
D-0715	Document	FTX Third-Party Production - CSV		TFL_SEC_00348805	TFL_SEC_00348805	Hearsay Relevance
D-0716	Document	FTX Third-Party Production - CSV		TFL_SEC_00348806	TFL_SEC_00348806	Hearsay Relevance
D-0717	Document	FTX Third-Party Production - CSV		TFL_SEC_00348807	TFL_SEC_00348807	Hearsay Relevance
D-0718	Document	FTX Third-Party Production - CSV		TFL_SEC_00348808	TFL_SEC_00348808	Hearsay Relevance
D-0719	Document	FTX Third-Party Production - CSV		TFL_SEC_00348809	TFL_SEC_00348809	Hearsay Relevance
D-0720	Document	FTX Third-Party Production - CSV		TFL_SEC_00348810	TFL_SEC_00348810	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Req. Bates No.	End. Bates No.	SEC's Objection
D-0721	Document	FTX Third-Party Production - CSV		TFL_SEC_00348811	TFL_SEC_00348811	Hearsay Relevance
D-0722	Document	FTX Third-Party Production - CSV		TFL_SEC_00348812	TFL_SEC_00348812	Hearsay Relevance
D-0723	Document	FTX Third-Party Production - CSV		TFL_SEC_00348813	TFL_SEC_00348813	Hearsay Relevance
D-0724	Document	FTX Third-Party Production - CSV		TFL_SEC_00348814	TFL_SEC_00348814	Hearsay Relevance
D-0725	Document	FTX Third-Party Production - CSV		TFL_SEC_00348815	TFL_SEC_00348815	Hearsay Relevance
D-0726	Document	FTX Third-Party Production - CSV		TFL_SEC_00348816	TFL_SEC_00348816	Hearsay Relevance
D-0727	Document	FTX Third-Party Production - CSV		TFL_SEC_00348817	TFL_SEC_00348817	Hearsay Relevance
D-0728	Document	FTX Third-Party Production - CSV		TFL_SEC_00348818	TFL_SEC_00348818	Hearsay Relevance
D-0729	Document	FTX Third-Party Production - CSV		TFL_SEC_00348819	TFL_SEC_00348819	Hearsay Relevance
D-0730	Document	FTX Third-Party Production - CSV		TFL_SEC_00348820	TFL_SEC_00348820	Hearsay Relevance
D-0731	Document	FTX Third-Party Production - CSV		TFL_SEC_00348821	TFL_SEC_00348821	Hearsay Relevance
D-0732	Document	FTX Third-Party Production - CSV		TFL_SEC_00348822	TFL_SEC_00348822	Hearsay Relevance
D-0733	Document	FTX Third-Party Production - CSV		TFL_SEC_00348823	TFL_SEC_00348823	Hearsay Relevance
D-0734	Document	FTX Third-Party Production - CSV		TFL_SEC_00348824	TFL_SEC_00348824	Hearsay Relevance
D-0735	Document	FTX Third-Party Production - CSV		TFL_SEC_00348825	TFL_SEC_00348825	Hearsay Relevance
D-0736	Document	FTX Third-Party Production - CSV		TFL_SEC_00348826	TFL_SEC_00348826	Hearsay Relevance
D-0737	Document	FTX Third-Party Production - CSV		TFL_SEC_00348827	TFL_SEC_00348827	Hearsay Relevance
D-0738	Document	FTX Third-Party Production - CSV		TFL_SEC_00348828	TFL_SEC_00348828	Hearsay Relevance
D-0739	Document	FTX Third-Party Production - CSV		TFL_SEC_00348829	TFL_SEC_00348829	Hearsay Relevance
D-0740	Document	FTX Third-Party Production - CSV		TFL_SEC_00348830	TFL_SEC_00348830	Hearsay Relevance
D-0741	Document	FTX Third-Party Production - CSV		TFL_SEC_00348831	TFL_SEC_00348831	Hearsay Relevance
D-0742	Document	FTX Third-Party Production - CSV		TFL_SEC_00348832	TFL_SEC_00348832	Hearsay Relevance
D-0743	Document	FTX Third-Party Production - CSV		TFL_SEC_00348833	TFL_SEC_00348833	Hearsay Relevance
D-0744	Document	FTX Third-Party Production - CSV		TFL_SEC_00348834	TFL_SEC_00348834	Hearsay Relevance
D-0745	Document	FTX Third-Party Production - CSV		TFL_SEC_00348835	TFL_SEC_00348835	Hearsay Relevance
D-0746	Document	FTX Third-Party Production - CSV		TFL_SEC_00348836	TFL_SEC_00348836	Hearsay Relevance
D-0747	Document	FTX Third-Party Production - CSV		TFL_SEC_00348837	TFL_SEC_00348837	Hearsay Relevance
D-0748	Document	FTX Third-Party Production - CSV		TFL_SEC_00348838	TFL_SEC_00348838	Hearsay Relevance
D-0749	Document	FTX Third-Party Production - CSV		TFL_SEC_00348839	TFL_SEC_00348839	Hearsay Relevance
D-0750	Document	FTX Third-Party Production - CSV		TFL_SEC_00348840	TFL_SEC_00348840	Hearsay Relevance
D-0751	Document	FTX Third-Party Production - CSV		TFL_SEC_00348841	TFL_SEC_00348841	Hearsay Relevance
D-0752	Document	FTX Third-Party Production - CSV		TFL_SEC_00348842	TFL_SEC_00348842	Hearsay Relevance
D-0753	Document	FTX Third-Party Production - CSV		TFL_SEC_00348843	TFL_SEC_00348843	Hearsay Relevance
D-0754	Document	FTX Third-Party Production - CSV		TFL_SEC_00348844	TFL_SEC_00348844	Hearsay Relevance
D-0755	Document	FTX Third-Party Production - CSV		TFL_SEC_00348845	TFL_SEC_00348845	Hearsay Relevance
D-0756	Document	FTX Third-Party Production - CSV		TFL_SEC_00348846	TFL_SEC_00348846	Hearsay Relevance
D-0757	Document	FTX Third-Party Production - CSV		TFL_SEC_00348847	TFL_SEC_00348847	Hearsay Relevance
D-0758	Document	FTX Third-Party Production - CSV		TFL_SEC_00348848	TFL_SEC_00348848	Hearsay Relevance
D-0759	Document	FTX Third-Party Production - CSV		TFL_SEC_00348849	TFL_SEC_00348849	Hearsay Relevance
D-0760	Document	FTX Third-Party Production - CSV		TFL_SEC_00348850	TFL_SEC_00348850	Hearsay Relevance
D-0761	Document	FTX Third-Party Production - CSV		TFL_SEC_00348851	TFL_SEC_00348851	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0762	Document	FTX Third-Party Production - CSV		TFL_SEC_00348852	TFL_SEC_00348852	Hearsay Relevance
D-0763	Document	FTX Third-Party Production - CSV		TFL_SEC_00348853	TFL_SEC_00348853	Hearsay Relevance
D-0764	Document	FTX Third-Party Production - CSV		TFL_SEC_00348854	TFL_SEC_00348854	Hearsay Relevance
D-0765	Document	FTX Third-Party Production - CSV		TFL_SEC_00348855	TFL_SEC_00348855	Hearsay Relevance
D-0766	Document	FTX Third-Party Production - CSV		TFL_SEC_00348856	TFL_SEC_00348856	Hearsay Relevance
D-0767	Document	FTX Third-Party Production - CSV		TFL_SEC_00348857	TFL_SEC_00348857	Hearsay Relevance
D-0768	Document	FTX Third-Party Production - CSV		TFL_SEC_00348858	TFL_SEC_00348858	Hearsay Relevance
D-0769	Document	FTX Third-Party Production - CSV		TFL_SEC_00348859	TFL_SEC_00348859	Hearsay Relevance
D-0770	Document	FTX Third-Party Production - CSV		TFL_SEC_00348860	TFL_SEC_00348860	Hearsay Relevance
D-0771	Document	FTX Third-Party Production - CSV		TFL_SEC_00348861	TFL_SEC_00348861	Hearsay Relevance
D-0772	Document	FTX Third-Party Production - CSV		TFL_SEC_00348862	TFL_SEC_00348862	Hearsay Relevance
D-0773	Document	FTX Third-Party Production - CSV		TFL_SEC_00348863	TFL_SEC_00348863	Hearsay Relevance
D-0774	Document	FTX Third-Party Production - CSV		TFL_SEC_00348864	TFL_SEC_00348864	Hearsay Relevance
D-0775	Document	FTX Third-Party Production - CSV		TFL_SEC_00348865	TFL_SEC_00348865	Hearsay Relevance
D-0776	Document	FTX Third-Party Production - CSV		TFL_SEC_00348866	TFL_SEC_00348866	Hearsay Relevance
D-0777	Document	FTX Third-Party Production - CSV		TFL_SEC_00348867	TFL_SEC_00348867	Hearsay Relevance
D-0778	Document	FTX Third-Party Production - CSV		TFL_SEC_00348868	TFL_SEC_00348868	Hearsay Relevance
D-0779	Document	FTX Third-Party Production - CSV		TFL_SEC_00348869	TFL_SEC_00348869	Hearsay Relevance
D-0780	Document	FTX Third-Party Production - CSV		TFL_SEC_00348870	TFL_SEC_00348870	Hearsay Relevance
D-0781	Document	FTX Third-Party Production - CSV		TFL_SEC_00348871	TFL_SEC_00348871	Hearsay Relevance
D-0782	Document	FTX Third-Party Production - CSV		TFL_SEC_00348872	TFL_SEC_00348872	Hearsay Relevance
D-0783	Document	FTX Third-Party Production - CSV		TFL_SEC_00348873	TFL_SEC_00348873	Hearsay Relevance
D-0784	Document	FTX Third-Party Production - CSV		TFL_SEC_00348874	TFL_SEC_00348874	Hearsay Relevance
D-0785	Document	FTX Third-Party Production - CSV		TFL_SEC_00348875	TFL_SEC_00348875	Hearsay Relevance
D-0786	Document	FTX Third-Party Production - CSV		TFL_SEC_00348876	TFL_SEC_00348876	Hearsay Relevance
D-0787	Document	FTX Third-Party Production - CSV		TFL_SEC_00348877	TFL_SEC_00348877	Hearsay Relevance
D-0788	Document	FTX Third-Party Production - CSV		TFL_SEC_00348878	TFL_SEC_00348878	Hearsay Relevance
D-0789	Document	FTX Third-Party Production - CSV		TFL_SEC_00348879	TFL_SEC_00348879	Hearsay Relevance
D-0790	Document	FTX Third-Party Production - CSV		TFL_SEC_00348880	TFL_SEC_00348880	Hearsay Relevance
D-0791	Document	FTX Third-Party Production - CSV		TFL_SEC_00348881	TFL_SEC_00348881	Hearsay Relevance
D-0792	Document	FTX Third-Party Production - CSV		TFL_SEC_00348882	TFL_SEC_00348882	Hearsay Relevance
D-0793	Document	FTX Third-Party Production - CSV		TFL_SEC_00348883	TFL_SEC_00348883	Hearsay Relevance
D-0794	Document	FTX Third-Party Production - CSV		TFL_SEC_00348884	TFL_SEC_00348884	Hearsay Relevance
D-0795	Document	FTX Third-Party Production - CSV		TFL_SEC_00348885	TFL_SEC_00348885	Hearsay Relevance
D-0796	Document	FTX Third-Party Production - CSV		TFL_SEC_00348886	TFL_SEC_00348886	Hearsay Relevance
D-0797	Document	FTX Third-Party Production - CSV		TFL_SEC_00348887	TFL_SEC_00348887	Hearsay Relevance
D-0798	Document	FTX Third-Party Production - CSV		TFL_SEC_00348888	TFL_SEC_00348888	Hearsay Relevance
D-0799	Document	FTX Third-Party Production - CSV		TFL_SEC_00348889	TFL_SEC_00348889	Hearsay Relevance
D-0800	Document	FTX Third-Party Production - CSV		TFL_SEC_00348890	TFL_SEC_00348890	Hearsay Relevance
D-0801	Document	FTX Third-Party Production - CSV		TFL_SEC_00348891	TFL_SEC_00348891	Hearsay Relevance
D-0802	Document	FTX Third-Party Production - CSV		TFL_SEC_00348892	TFL_SEC_00348892	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0803	Document	FTX Third-Party Production - CSV		TFL_SEC_00348893	TFL_SEC_00348893	Hearsay Relevance
D-0804	Document	FTX Third-Party Production - CSV		TFL_SEC_00348894	TFL_SEC_00348894	Hearsay Relevance
D-0805	Document	FTX Third-Party Production - CSV		TFL_SEC_00348895	TFL_SEC_00348895	Hearsay Relevance
D-0806	Document	FTX Third-Party Production - CSV		TFL_SEC_00348896	TFL_SEC_00348896	Hearsay Relevance
D-0807	Document	FTX Third-Party Production - CSV		TFL_SEC_00348897	TFL_SEC_00348897	Hearsay Relevance
D-0808	Document	FTX Third-Party Production - CSV		TFL_SEC_00348898	TFL_SEC_00348898	Hearsay Relevance
D-0809	Document	FTX Third-Party Production - CSV		TFL_SEC_00348899	TFL_SEC_00348899	Hearsay Relevance
D-0810	Document	FTX Third-Party Production - CSV		TFL_SEC_00348900	TFL_SEC_00348900	Hearsay Relevance
D-0811	Document	FTX Third-Party Production - CSV		TFL_SEC_00348901	TFL_SEC_00348901	Hearsay Relevance
D-0812	Document	FTX Third-Party Production - CSV		TFL_SEC_00348902	TFL_SEC_00348902	Hearsay Relevance
D-0813	Document	FTX Third-Party Production - CSV		TFL_SEC_00348903	TFL_SEC_00348903	Hearsay Relevance
D-0814	Document	FTX Third-Party Production - CSV		TFL_SEC_00348904	TFL_SEC_00348904	Hearsay Relevance
D-0815	Document	FTX Third-Party Production - CSV		TFL_SEC_00348905	TFL_SEC_00348905	Hearsay Relevance
D-0816	Document	FTX Third-Party Production - CSV		TFL_SEC_00348906	TFL_SEC_00348906	Hearsay Relevance
D-0817	Document	FTX Third-Party Production - CSV		TFL_SEC_00348907	TFL_SEC_00348907	Hearsay Relevance
D-0818	Document	FTX Third-Party Production - CSV		TFL_SEC_00348908	TFL_SEC_00348908	Hearsay Relevance
D-0819	Document	FTX Third-Party Production - CSV		TFL_SEC_00348909	TFL_SEC_00348909	Hearsay Relevance
D-0820	Document	FTX Third-Party Production - CSV		TFL_SEC_00348910	TFL_SEC_00348910	Hearsay Relevance
D-0821	Document	FTX Third-Party Production - CSV		TFL_SEC_00348911	TFL_SEC_00348911	Hearsay Relevance
D-0822	Document	FTX Third-Party Production - CSV		TFL_SEC_00348912	TFL_SEC_00348912	Hearsay Relevance
D-0823	Document	FTX Third-Party Production - CSV		TFL_SEC_00348913	TFL_SEC_00348913	Hearsay Relevance
D-0824	Document	FTX Third-Party Production - CSV		TFL_SEC_00348914	TFL_SEC_00348914	Hearsay Relevance
D-0825	Document	FTX Third-Party Production - CSV		TFL_SEC_00348915	TFL_SEC_00348915	Hearsay Relevance
D-0826	Document	FTX Third-Party Production - CSV		TFL_SEC_00348916	TFL_SEC_00348916	Hearsay Relevance
D-0827	Document	FTX Third-Party Production - CSV		TFL_SEC_00348917	TFL_SEC_00348917	Hearsay Relevance
D-0828	Document	FTX Third-Party Production - CSV		TFL_SEC_00348918	TFL_SEC_00348918	Hearsay Relevance
D-0829	Document	FTX Third-Party Production - CSV		TFL_SEC_00348919	TFL_SEC_00348919	Hearsay Relevance
D-0830	Document	FTX Third-Party Production - CSV		TFL_SEC_00348920	TFL_SEC_00348920	Hearsay Relevance
D-0831	Document	FTX Third-Party Production - CSV		TFL_SEC_00348921	TFL_SEC_00348921	Hearsay Relevance
D-0832	Document	FTX Third-Party Production - CSV		TFL_SEC_00348922	TFL_SEC_00348922	Hearsay Relevance
D-0833	Document	FTX Third-Party Production - CSV		TFL_SEC_00348923	TFL_SEC_00348923	Hearsay Relevance
D-0834	Document	FTX Third-Party Production - CSV		TFL_SEC_00348924	TFL_SEC_00348924	Hearsay Relevance
D-0835	Document	FTX Third-Party Production - CSV		TFL_SEC_00348925	TFL_SEC_00348925	Hearsay Relevance
D-0836	Document	FTX Third-Party Production - CSV		TFL_SEC_00348926	TFL_SEC_00348926	Hearsay Relevance
D-0837	Document	FTX Third-Party Production - CSV		TFL_SEC_00348927	TFL_SEC_00348927	Hearsay Relevance
D-0838	Document	FTX Third-Party Production - CSV		TFL_SEC_00348928	TFL_SEC_00348928	Hearsay Relevance
D-0839	Document	FTX Third-Party Production - CSV		TFL_SEC_00348929	TFL_SEC_00348929	Hearsay Relevance
D-0840	Document	FTX Third-Party Production - CSV		TFL_SEC_00348930	TFL_SEC_00348930	Hearsay Relevance
D-0841	Document	FTX Third-Party Production - CSV		TFL_SEC_00348931	TFL_SEC_00348931	Hearsay Relevance
D-0842	Document	FTX Third-Party Production - CSV		TFL_SEC_00348932	TFL_SEC_00348932	Hearsay Relevance
D-0843	Document	FTX Third-Party Production - CSV		TFL_SEC_00348933	TFL_SEC_00348933	Hearsay Relevance



## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0844	Document	FTX Third-Party Production - CSV		TFL_SEC_00348934	TFL_SEC_00348934	Hearsay Relevance
D-0845	Document	FTX Third-Party Production - CSV		TFL_SEC_00348935	TFL_SEC_00348935	Hearsay Relevance
D-0846	Document	FTX Third-Party Production - CSV		TFL_SEC_00348936	TFL_SEC_00348936	Hearsay Relevance
D-0847	Document	FTX Third-Party Production - CSV		TFL_SEC_00348937	TFL_SEC_00348937	Hearsay Relevance
D-0848	Document	FTX Third-Party Production - CSV		TFL_SEC_00348938	TFL_SEC_00348938	Hearsay Relevance
D-0849	Document	FTX Third-Party Production - CSV		TFL_SEC_00348939	TFL_SEC_00348939	Hearsay Relevance
D-0850	Document	FTX Third-Party Production - CSV		TFL_SEC_00348940	TFL_SEC_00348940	Hearsay Relevance
D-0851	Document	FTX Third-Party Production - CSV		TFL_SEC_00348941	TFL_SEC_00348941	Hearsay Relevance
D-0852	Document	FTX Third-Party Production - CSV		TFL_SEC_00348942	TFL_SEC_00348942	Hearsay Relevance
D-0853	Document	FTX Third-Party Production - CSV		TFL_SEC_00348943	TFL_SEC_00348943	Hearsay Relevance
D-0854	Document	FTX Third-Party Production - CSV		TFL_SEC_00348944	TFL_SEC_00348944	Hearsay Relevance
D-0855	Document	FTX Third-Party Production - CSV		TFL_SEC_00348945	TFL_SEC_00348945	Hearsay Relevance
D-0856	Document	FTX Third-Party Production - CSV		TFL_SEC_00348946	TFL_SEC_00348946	Hearsay Relevance
D-0857	Document	FTX Third-Party Production - CSV		TFL_SEC_00348947	TFL_SEC_00348947	Hearsay Relevance
D-0858	Document	FTX Third-Party Production - CSV		TFL_SEC_00348948	TFL_SEC_00348948	Hearsay Relevance
D-0859	Document	FTX Third-Party Production - CSV		TFL_SEC_00348949	TFL_SEC_00348949	Hearsay Relevance
D-0860	Document	FTX Third-Party Production - CSV		TFL_SEC_00348950	TFL_SEC_00348950	Hearsay Relevance
D-0861	Document	FTX Third-Party Production - CSV		TFL_SEC_00348951	TFL_SEC_00348951	Hearsay Relevance
D-0862	Document	FTX Third-Party Production - CSV		TFL_SEC_00348952	TFL_SEC_00348952	Hearsay Relevance
D-0863	Document	FTX Third-Party Production - CSV		TFL_SEC_00348953	TFL_SEC_00348953	Hearsay Relevance
D-0864	Document	FTX Third-Party Production - CSV		TFL_SEC_00348954	TFL_SEC_00348954	Hearsay Relevance
D-0865	Document	FTX Third-Party Production - CSV		TFL_SEC_00348955	TFL_SEC_00348955	Hearsay Relevance
D-0866	Document	FTX Third-Party Production - CSV		TFL_SEC_00348956	TFL_SEC_00348956	Hearsay Relevance
D-0867	Document	FTX Third-Party Production - CSV		TFL_SEC_00348957	TFL_SEC_00348957	Hearsay Relevance
D-0868	Document	FTX Third-Party Production - CSV		TFL_SEC_00348958	TFL_SEC_00348958	Hearsay Relevance
D-0869	Document	FTX Third-Party Production - CSV		TFL_SEC_00348959	TFL_SEC_00348959	Hearsay Relevance
D-0870	Document	FTX Third-Party Production - CSV		TFL_SEC_00348960	TFL_SEC_00348960	Hearsay Relevance
D-0871	Document	FTX Third-Party Production - CSV		TFL_SEC_00348961	TFL_SEC_00348961	Hearsay Relevance
D-0872	Document	FTX Third-Party Production - CSV		TFL_SEC_00348962	TFL_SEC_00348962	Hearsay Relevance
D-0873	Document	FTX Third-Party Production - CSV		TFL_SEC_00348963	TFL_SEC_00348963	Hearsay Relevance
D-0874	Document	FTX Third-Party Production - CSV		TFL_SEC_00348964	TFL_SEC_00348964	Hearsay Relevance
D-0875	Document	FTX Third-Party Production - CSV		TFL_SEC_00348965	TFL_SEC_00348965	Hearsay Relevance
D-0876	Document	FTX Third-Party Production - CSV		TFL_SEC_00348966	TFL_SEC_00348966	Hearsay Relevance
D-0877	Document	FTX Third-Party Production - CSV		TFL_SEC_00348967	TFL_SEC_00348967	Hearsay Relevance
D-0878	Document	FTX Third-Party Production - CSV		TFL_SEC_00348968	TFL_SEC_00348968	Hearsay Relevance
D-0879	Document	FTX Third-Party Production - CSV		TFL_SEC_00348969	TFL_SEC_00348969	Hearsay Relevance
D-0880	Document	FTX Third-Party Production - CSV		TFL_SEC_00348970	TFL_SEC_00348970	Hearsay Relevance
D-0881	Document	FTX Third-Party Production - CSV		TFL_SEC_00348971	TFL_SEC_00348971	Hearsay Relevance
D-0882	Document	FTX Third-Party Production - CSV		TFL_SEC_00348972	TFL_SEC_00348972	Hearsay Relevance
D-0883	Document	FTX Third-Party Production - CSV		TFL_SEC_00348973	TFL_SEC_00348973	Hearsay Relevance
D-0884	Document	FTX Third-Party Production - CSV		TFL_SEC_00348974	TFL_SEC_00348974	Hearsay Relevance



## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-0885	Document	FTX Third-Party Production - CSV		TFL_SEC_00348975	TFL_SEC_00348975	Hearsay Relevance
D-0886	Document	FTX Third-Party Production - CSV		TFL_SEC_00348976	TFL_SEC_00348976	Hearsay Relevance
D-0887	Document	FTX Third-Party Production - CSV		TFL_SEC_00348977	TFL_SEC_00348977	Hearsay Relevance
D-0888	Document	FTX Third-Party Production - CSV		TFL_SEC_00348978	TFL_SEC_00348978	Hearsay Relevance
D-0889	Document	FTX Third-Party Production - CSV		TFL_SEC_00348979	TFL_SEC_00348979	Hearsay Relevance
D-0890	Document	FTX Third-Party Production - CSV		TFL_SEC_00348980	TFL_SEC_00348980	Hearsay Relevance
D-0891	Document	FTX Third-Party Production - CSV		TFL_SEC_00348981	TFL_SEC_00348981	Hearsay Relevance
D-0892	Document	FTX Third-Party Production - CSV		TFL_SEC_00348982	TFL_SEC_00348982	Hearsay Relevance
D-0893	Document	FTX Third-Party Production - CSV		TFL_SEC_00348983	TFL_SEC_00348983	Hearsay Relevance
D-0894	Document	FTX Third-Party Production - CSV		TFL_SEC_00348984	TFL_SEC_00348984	Hearsay Relevance
D-0895	Document	FTX Third-Party Production - CSV		TFL_SEC_00348985	TFL_SEC_00348985	Hearsay Relevance
D-0896	Document	FTX Third-Party Production - CSV		TFL_SEC_00348986	TFL_SEC_00348986	Hearsay Relevance
D-0897	Document	FTX Third-Party Production - CSV		TFL_SEC_00348987	TFL_SEC_00348987	Hearsay Relevance
D-0898	Document	FTX Third-Party Production - CSV		TFL_SEC_00348988	TFL_SEC_00348988	Hearsay Relevance
D-0899	Document	FTX Third-Party Production - CSV		TFL_SEC_00348989	TFL_SEC_00348989	Hearsay Relevance
D-0900	Document	FTX Third-Party Production - CSV		TFL_SEC_00348990	TFL_SEC_00348990	Hearsay Relevance
D-0901	Document	FTX Third-Party Production - CSV		TFL_SEC_00348991	TFL_SEC_00348991	Hearsay Relevance
D-0902	Document	FTX Third-Party Production - CSV		TFL_SEC_00348992	TFL_SEC_00348992	Hearsay Relevance
D-0903	Document	FTX Third-Party Production - CSV		TFL_SEC_00348993	TFL_SEC_00348993	Hearsay Relevance
D-0904	Document	FTX Third-Party Production - CSV		TFL_SEC_00348994	TFL_SEC_00348994	Hearsay Relevance
D-0905	Document	FTX Third-Party Production - CSV		TFL_SEC_00348995	TFL_SEC_00348995	Hearsay Relevance
D-0906	Document	FTX Third-Party Production - CSV		TFL_SEC_00348996	TFL_SEC_00348996	Hearsay Relevance
D-0907	Document	FTX Third-Party Production - CSV		TFL_SEC_00348997	TFL_SEC_00348997	Hearsay Relevance
D-0908	Document	FTX Third-Party Production - CSV		TFL_SEC_00348998	TFL_SEC_00348998	Hearsay Relevance
D-0909	Document	FTX Third-Party Production - CSV		TFL_SEC_00348999	TFL_SEC_00348999	Hearsay Relevance
D-0910	Document	FTX Third-Party Production - CSV		TFL_SEC_00349000	TFL_SEC_00349000	Hearsay Relevance
D-0911	Document	FTX Third-Party Production - CSV		TFL_SEC_00349001	TFL_SEC_00349001	Hearsay Relevance
D-0912	Document	FTX Third-Party Production - CSV		TFL_SEC_00349002	TFL_SEC_00349002	Hearsay Relevance
D-0913	Document	FTX Third-Party Production - CSV		TFL_SEC_00349003	TFL_SEC_00349003	Hearsay Relevance
D-0914	Document	FTX Third-Party Production - CSV		TFL_SEC_00349004	TFL_SEC_00349004	Hearsay Relevance
D-0915	Document	FTX Third-Party Production - CSV		TFL_SEC_00349005	TFL_SEC_00349005	Hearsay Relevance
D-0916	Document	FTX Third-Party Production - CSV		TFL_SEC_00349006	TFL_SEC_00349006	Hearsay Relevance
D-0917	Document	FTX Third-Party Production - CSV		TFL_SEC_00349007	TFL_SEC_00349007	Hearsay Relevance
D-0918	Document	FTX Third-Party Production - CSV		TFL_SEC_00349008	TFL_SEC_00349008	Hearsay Relevance
D-0919	Document	FTX Third-Party Production - CSV		TFL_SEC_00349009	TFL_SEC_00349009	Hearsay Relevance
D-0920	Document	FTX Third-Party Production - CSV		TFL_SEC_00349010	TFL_SEC_00349010	Hearsay Relevance
D-0921	Document	FTX Third-Party Production - CSV		TFL_SEC_00349011	TFL_SEC_00349011	Hearsay Relevance
D-0922	Document	FTX Third-Party Production - CSV		TFL_SEC_00349012	TFL_SEC_00349012	Hearsay Relevance
D-0923	Document	FTX Third-Party Production - CSV		TFL_SEC_00349013	TFL_SEC_00349013	Hearsay Relevance
D-0924	Document	FTX Third-Party Production - CSV		TFL_SEC_00349014	TFL_SEC_00349014	Hearsay Relevance
D-0925	Document	FTX Third-Party Production - CSV		TFL_SEC_00349015	TFL_SEC_00349015	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0926	Document	FTX Third-Party Production - CSV		TFL_SEC_00349016	TFL_SEC_00349016	Hearsay Relevance
D-0927	Document	FTX Third-Party Production - CSV		TFL_SEC_00349017	TFL_SEC_00349017	Hearsay Relevance
D-0928	Document	FTX Third-Party Production - CSV		TFL_SEC_00349018	TFL_SEC_00349018	Hearsay Relevance
D-0929	Document	FTX Third-Party Production - CSV		TFL_SEC_00349019	TFL_SEC_00349019	Hearsay Relevance
D-0930	Document	FTX Third-Party Production - CSV		TFL_SEC_00349020	TFL_SEC_00349020	Hearsay Relevance
D-0931	Document	FTX Third-Party Production - CSV		TFL_SEC_00349021	TFL_SEC_00349021	Hearsay Relevance
D-0932	Document	FTX Third-Party Production - CSV		TFL_SEC_00349022	TFL_SEC_00349022	Hearsay Relevance
D-0933	Document	FTX Third-Party Production - CSV		TFL_SEC_00349023	TFL_SEC_00349023	Hearsay Relevance
D-0934	Document	FTX Third-Party Production - CSV		TFL_SEC_00349024	TFL_SEC_00349024	Hearsay Relevance
D-0935	Document	FTX Third-Party Production - CSV		TFL_SEC_00349025	TFL_SEC_00349025	Hearsay Relevance
D-0936	Document	FTX Third-Party Production - CSV		TFL_SEC_00349026	TFL_SEC_00349026	Hearsay Relevance
D-0937	Document	FTX Third-Party Production - CSV		TFL_SEC_00349027	TFL_SEC_00349027	Hearsay Relevance
D-0938	Document	FTX Third-Party Production - CSV		TFL_SEC_00349028	TFL_SEC_00349028	Hearsay Relevance
D-0939	Document	FTX Third-Party Production - CSV		TFL_SEC_00349029	TFL_SEC_00349029	Hearsay Relevance
D-0940	Document	FTX Third-Party Production - CSV		TFL_SEC_00349030	TFL_SEC_00349030	Hearsay Relevance
D-0941	Document	FTX Third-Party Production - CSV		TFL_SEC_00349031	TFL_SEC_00349031	Hearsay Relevance
D-0942	Document	FTX Third-Party Production - CSV		TFL_SEC_00349032	TFL_SEC_00349032	Hearsay Relevance
D-0943	Document	FTX Third-Party Production - CSV		TFL_SEC_00349033	TFL_SEC_00349033	Hearsay Relevance
D-0944	Document	FTX Third-Party Production - CSV		TFL_SEC_00349034	TFL_SEC_00349034	Hearsay Relevance
D-0945	Document	FTX Third-Party Production - CSV		TFL_SEC_00349035	TFL_SEC_00349035	Hearsay Relevance
D-0946	Document	FTX Third-Party Production - CSV		TFL_SEC_00349036	TFL_SEC_00349036	Hearsay Relevance
D-0947	Document	FTX Third-Party Production - CSV		TFL_SEC_00349037	TFL_SEC_00349037	Hearsay Relevance
D-0948	Document	FTX Third-Party Production - CSV		TFL_SEC_00349038	TFL_SEC_00349038	Hearsay Relevance
D-0949	Document	FTX Third-Party Production - CSV		TFL_SEC_00349039	TFL_SEC_00349039	Hearsay Relevance
D-0950	Document	FTX Third-Party Production - CSV		TFL_SEC_00349040	TFL_SEC_00349040	Hearsay Relevance
D-0951	Document	FTX Third-Party Production - CSV		TFL_SEC_00349041	TFL_SEC_00349041	Hearsay Relevance
D-0952	Document	FTX Third-Party Production - CSV		TFL_SEC_00349042	TFL_SEC_00349042	Hearsay Relevance
D-0953	Document	FTX Third-Party Production - CSV		TFL_SEC_00349043	TFL_SEC_00349043	Hearsay Relevance
D-0954	Document	FTX Third-Party Production - CSV		TFL_SEC_00349044	TFL_SEC_00349044	Hearsay Relevance
D-0955	Document	FTX Third-Party Production - CSV		TFL_SEC_00349045	TFL_SEC_00349045	Hearsay Relevance
D-0956	Document	FTX Third-Party Production - CSV		TFL_SEC_00349046	TFL_SEC_00349046	Hearsay Relevance
D-0957	Document	FTX Third-Party Production - CSV		TFL_SEC_00349047	TFL_SEC_00349047	Hearsay Relevance
D-0958	Document	FTX Third-Party Production - CSV		TFL_SEC_00349048	TFL_SEC_00349048	Hearsay Relevance
D-0959	Document	FTX Third-Party Production - CSV		TFL_SEC_00349049	TFL_SEC_00349049	Hearsay Relevance
D-0960	Document	FTX Third-Party Production - CSV		TFL_SEC_00349050	TFL_SEC_00349050	Hearsay Relevance
D-0961	Document	FTX Third-Party Production - CSV		TFL_SEC_00349051	TFL_SEC_00349051	Hearsay Relevance
D-0962	Document	FTX Third-Party Production - CSV		TFL_SEC_00349052	TFL_SEC_00349052	Hearsay Relevance
D-0963	Document	FTX Third-Party Production - CSV		TFL_SEC_00349053	TFL_SEC_00349053	Hearsay Relevance
D-0964	Document	FTX Third-Party Production - CSV		TFL_SEC_00349054	TFL_SEC_00349054	Hearsay Relevance
D-0965	Document	FTX Third-Party Production - CSV		TFL_SEC_00349055	TFL_SEC_00349055	Hearsay Relevance
D-0966	Document	FTX Third-Party Production - CSV		TFL_SEC_00349056	TFL_SEC_00349056	Hearsay Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-0967	Document	FTX Third-Party Production - CSV		TFL_SEC_00349057	TFL_SEC_00349057	Hearsay Relevance
D-0968	Document	FTX Third-Party Production - CSV		TFL_SEC_00349058	TFL_SEC_00349058	Hearsay Relevance
D-0969	Document	FTX Third-Party Production - CSV		TFL_SEC_00349059	TFL_SEC_00349059	Hearsay Relevance
D-0970	Document	FTX Third-Party Production - CSV		TFL_SEC_00349060	TFL_SEC_00349060	Hearsay Relevance
D-0971	Document	FTX Third-Party Production - CSV		TFL_SEC_00349061	TFL_SEC_00349061	Hearsay Relevance
D-0972	Document	FTX Third-Party Production - CSV		TFL_SEC_00349062	TFL_SEC_00349062	Hearsay Relevance
D-0973	Document	FTX Third-Party Production - CSV		TFL_SEC_00349063	TFL_SEC_00349063	Hearsay Relevance
D-0974	Document	FTX Third-Party Production - CSV		TFL_SEC_00349064	TFL_SEC_00349064	Hearsay Relevance
D-0975	Document	FTX Third-Party Production - CSV		TFL_SEC_00349065	TFL_SEC_00349065	Hearsay Relevance
D-0976	Document	FTX Third-Party Production - CSV		TFL_SEC_00349066	TFL_SEC_00349066	Hearsay Relevance
D-0977	Document	FTX Third-Party Production - CSV		TFL_SEC_00349067	TFL_SEC_00349067	Hearsay Relevance
D-0978	Document	FTX Third-Party Production - CSV		TFL_SEC_00349068	TFL_SEC_00349068	Hearsay Relevance
D-0979	Document	FTX Third-Party Production - CSV		TFL_SEC_00349069	TFL_SEC_00349069	Hearsay Relevance
D-0980	Document	FTX Third-Party Production - CSV		TFL_SEC_00349070	TFL_SEC_00349070	Hearsay Relevance
D-0981	Document	FTX Third-Party Production - CSV		TFL_SEC_00349071	TFL_SEC_00349071	Hearsay Relevance
D-0982	Document	FTX Third-Party Production - CSV		TFL_SEC_00349072	TFL_SEC_00349072	Hearsay Relevance
D-0983	Document	FTX Third-Party Production - CSV		TFL_SEC_00349073	TFL_SEC_00349073	Hearsay Relevance
D-0984	Document	FTX Third-Party Production - CSV		TFL_SEC_00349074	TFL_SEC_00349074	Hearsay Relevance
D-0985	Document	FTX Third-Party Production - CSV		TFL_SEC_00349075	TFL_SEC_00349075	Hearsay Relevance
D-0986	Document	FTX Third-Party Production - CSV		TFL_SEC_00349076	TFL_SEC_00349076	Hearsay Relevance
D-0987	Document	FTX Third-Party Production - CSV		TFL_SEC_00349077	TFL_SEC_00349077	Hearsay Relevance
D-0988	Document	Galois Capital Third-Party Production - Spreadsheet		TFL_SEC_00350942	TFL_SEC_00350942	Relevance
D-0989	Document	Galois Capital Third-Party Production - Spreadsheet		TFL_SEC_00350943	TFL_SEC_00350943	Relevance
D-0990	Document	Genesis Terraform Third-Party Production - Spreadsheet		TFL_SEC_00352688	TFL_SEC_00352690	Hearsay Relevance
D-0991	Document	Genesis Terraform Third-Party Production - Spreadsheet		TFL_SEC_00352691	TFL_SEC_00352693	Hearsay Relevance
D-0992	Document	<a href="https://chainsco.pe/terra2/address/terra14i46jrdgdhaw4cejuix50ndp0hss95ekt2kfmw">https://chainsco.pe/terra2/address/terra14i46jrdgdhaw4cejuix50ndp0hss95ekt2kfmw</a>				Authenticity
D-0993	Document	<a href="https://chainsco.pe/terra2/address/terra1luagdlcr9c9vvp3ak4d7chjm5gldcmgl5n5rku5">https://chainsco.pe/terra2/address/terra1luagdlcr9c9vvp3ak4d7chjm5gldcmgl5n5rku5</a>				Authenticity
D-0994	Document	<a href="https://chainsco.pe/terra2/address/terra1ncjg4a59x2pgvqv9qivqprli8lrwshm0wieht5">https://chainsco.pe/terra2/address/terra1ncjg4a59x2pgvqv9qivqprli8lrwshm0wieht5</a>				Authenticity
D-0995	Document	<a href="https://chainsco.pe/terra2/address/terra1rvxcszylcrt2v3a7md8p30hvu39kl6xf48w9e">https://chainsco.pe/terra2/address/terra1rvxcszylcrt2v3a7md8p30hvu39kl6xf48w9e</a>				Authenticity
D-0996	Document	Internal systems list		LFM-000125 TFL_SEC_00349308	LFM-000128 TFL_SEC_00349311	Hearsay unless used with Hunsaker
D-0997	Document	Journal of Accounting Research, Forthcoming, Chicago Booth Research Paper No. 19-01, Fama-Miller Working Paper, Rock Center for Corporate Governance at Stanford University Working Paper No. 237. SSRN: <a href="https://ssrn.com/abstract=3310360">https://ssrn.com/abstract=3310360</a> or <a href="http://dx.doi.org/10.2139/ssrn.3310360">http://dx.doi.org/10.2139/ssrn.3310360</a>				Hearsay Relevance Foundation
D-0998	Document	Jump employee list		LFM-000130 TFL_SEC_00349312	LFM-000130 TFL_SEC_00349312	Hearsay unless used with Hunsaker
D-0999	Document	Merchant wallets document		TFL_SEC_00182107	TFL_SEC_00182108	None
D-1000	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1001	Document	Official Korean to English Translation of TFL_SEC_00223957, File "EACACTRL00206471_EN.docx"		TFL_SEC_00223957		Hearsay
D-1002	Document	Opinion and order in USA v. Chastain				Relevance
D-1003	Document	Photo of TFL Personnel (1)				Relevance
D-1004	Document	Photo of TFL Personnel (2)				Relevance
D-1005	Document	Photo of TFL Personnel (3)				Relevance
D-1006	Document	Photo of TFL Personnel (4)				Relevance
D-1007	Document	Photo of TFL Personnel (5)				Relevance
D-1008	Document	Polychain. "Chai. A disruptive payment solution for an exploding Asian eCommerce market."	n.d.	POLY10019591	POLY10019615	Hearsay

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-1009	Document	Presentation Deck: Terra: A blockchain payment network		TFL_SEC_00206183	TFL_SEC_00206208	Hearsay
D-1010	Document	Prod 1 Deposits FTX Spreadsheet		TFL_SEC_00270070	TFL_SEC_00270070	Hearsay Relevance
D-1011	Document	Terra Docs Bank Module Description				Hearsay
D-1012	Document	Terra FAQs		TFL_SEC_00269715	TFL_SEC_00269719	Hearsay
D-1013	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1014	Document	Discord message log	n.d.	TFL_0009450		Hearsay
D-1015(A)	Email	Email from Quip to CJ Han re LP-server sophistication - Korean	9/25/2019	TFL_SEC_00196954	TFL_SEC_00196954	Objection withdrawn
D-1015(B)	Email	Email from Quip to CJ Han re LP-server sophistication - English	9/25/2019	TFL_SEC_00196954	TFL_SEC_00196954	Hearsay
D-1016	Document	10/9/2020 Slack conversation between Etienne Napoleone and Paul Kim	10/9/2020	TFL_SEC_00214227	TFL_SEC_00214229	None
D-1017(A)	Document	Email from Do Kwon to honggeiyang83@gmail.com, daniel@terra.money, et al., re KB Investment IR request - Korean	7/15/2019	TFL_SEC_00222092	TFL_SEC_00222094	Hearsay
D-1017(B)	Document	Email from Do Kwon to honggeiyang83@gmail.com, daniel@terra.money, et al., re KB Investment IR request - English	7/15/2019	TFL_SEC_00222092	TFL_SEC_00222094	Hearsay
D-1018(A)	Document	Email from Alex Kim to chai-finance/api-server re [chai-finance/api-server] [8]	1/21/2020	TFL_SEC_00224542	TFL_SEC_00224543	Hearsay
D-1018(B)	Document	Email from Alex Kim to chai-finance/api-server re [chai-finance/api-server] [8] - English	1/21/2020	TFL_SEC_00224542	TFL_SEC_00224543	Hearsay
D-1019(A)	Document	Email from Jake Chang to Do Kwon re [Marketing] Q3 2019 Quarterly Checkin - Korean	7/15/2019	TFL_SEC_00227368	TFL_SEC_00227368	Hearsay
D-1019(B)	Document	Email from Jake Chang to Do Kwon re [Marketing] Q3 2019 Quarterly Checkin - English	7/15/2019	TFL_SEC_00227368	TFL_SEC_00227368	Hearsay
D-1020(A)	Document	Email from Don Kim to Jaewon.lim@mastercard.com re [Chai x Mastercard]	7/1/2019	TFL_SEC_00233432	TFL_SEC_00233432	Hearsay
D-1020(B)	Document	Email from Don Kim to Jaewon.lim@mastercard.com re [Chai x Mastercard] - English translation.	7/1/2019	TFL_SEC_00233432	TFL_SEC_00233432	Hearsay
D-1021	Document	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1022	Document	Token Sales Agreement		TFL_SEC_A_00107715	TFL_SEC_A_00107741	Relevance
D-1023	Document	UST - Anatomy of a Run				Hearsay Relevance
D-1024	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: astro_execution_api (confidential)				Relevance
D-1025	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: astro_execution_api_Redacted				Relevance
D-1026	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: terra_execution (confidential)				Relevance
D-1027	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: terra_execution_Redacted				Relevance
D-1028	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: terramintburn_execution_api (confidential)				Relevance
D-1029	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: terramintburn_execution_api_Redacted				Relevance
D-1030	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: terraswap_execution_api (confidential)				Relevance
D-1031	Document	Wintermute Source code created between 1 February 2022 and 31 May 2022 that was used to enter into the Transactions: terraswap_execution_api_Redacted				Relevance
D-1032	Document	Wintermute Wallet address				Relevance
D-1033	Document	Luna: Understanding the Terra-Ecosystem		TRIB00003215; Sethi Dep Ex. 25	TRIB00003222; Sethi Dep Ex. 25	Hearsay Relevance
D-1034	Document	Exhibit 8 from Deposition(s) of Marina Gurevich / Evgeny Gaevoy - Wintermute LUNA Liquidity Consulting and Loan Agreement	9/14/2021	TFL_SEC_00215947	TFL_SEC_00215958	None
D-1035	Document	Exhibit 9 from Deposition(s) of Marina Gurevich / Evgeny Gaevoy - Wintermute ANC Liquidity Consulting and Loan Agreement	4/19/2022	TFL_SEC_00298436	TFL_SEC_00298446	Relevance
D-1036	Document	Loan Confirmation	9/7/2020	TFL_SEC_00165249	TFL_SEC_00165254	None
D-1037	Document	Amended and Restated Loan Agreement	4/2/2021	TFL_SEC_00184232	TFL_SEC_00184236	None
D-1038	Document	Master Loan Agreement	8/15/2020	TFL_SEC_00219471	TFL_SEC_00219486	None
D-1039	Document	README.md file for terra-money-lp-server				None



Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-1040	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <code>terra1dp0taj85ruc299rkdvpz4z5pfg6z6suaed74e6</code> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-1041	Document	Blockchain data, including records of token transfers, wallet account balances, approvals, messages, authorizations, transactions, confirmations, or any other information or activity that was undertaken with respect to Terra Wallet address <code>terra1na2r5d5e66hh2fx44avgzw5cxvem2j0aaz0nk</code> , where such data has been previously recorded in a block on the Terra Classic blockchain and can be publicly accessed and retrieved via existing nodes or tools such as <a href="https://finder.terra.money/classic/">https://finder.terra.money/classic/</a>				None
D-1042	Document	Chai Corporation Inc. registration document				None
D-1200(A)	Email	Email from woonam.jung@chai.finance to RT@terra.money, finance@terra.money, finance@chai.finance - Korean	4/15/2017	TFL_SEC_00326189	TFL_SEC_00326189	Hearsay
D-1200(B)	Email	Email from woonam.jung@chai.finance to RT@terra.money, finance@terra.money, finance@chai.finance - English translation	4/15/2017	TFL_SEC_00326189	TFL_SEC_00326189	Hearsay
D-1201	Email	Email from Natalie Lau to Do Kwon, et. al, regarding Terra < Lightspeed	10/15/2018	TFL_SEC_00256185	TFL_SEC_00256188	Hearsay Relevance
D-1202	Email	Emails between Paul Kim and Amy Ko regarding the hosting of Naver Cloud services for Chai, and certified English translation	10/15/2018	TFL_SEC_00248411	TFL_SEC_00248411	Hearsay
D-1203	Email	Email from abhi@nucleus.vision.com to D. Shin	10/19/2018	TFL_SEC_00203501	TFL_SEC_00203501	Hearsay Relevance
D-1204	Email	Email from abhi@nucleus.vision.com to D. Shin	11/11/2018	TFL_SEC_00265201	TFL_SEC_00265201	Hearsay Relevance
D-1205(A)	Email	Email from Naver Corporation to CJ Han, Paul Kim, Jephil Choi noting billing details for Chai Finance account. Original Korean and English translation	12/4/2018	TFL_SEC_00310482	TFL_SEC_00310483	Hearsay
D-1205(B)	Email	Attachment to email from Naver Corporation to CJ Han, Paul Kim, Jephil Choi noting billing details for Chai Finance account. Original Korean and English translation	12/4/2018	TFL_SEC_00310482	TFL_SEC_00310483	Hearsay
D-1206	Email	Email from Do Kwon to Terra Investor Relations, et al.	5/22/2019	TFL_SEC_00292512	TFL_SEC_00292514	Hearsay
D-1207	Email	Email from Paul Kim regarding Naver Cloud charges to Gaza Labs and Chai	6/4/2019	TFL_SEC_00248418	TFL_SEC_00248419	Hearsay
D-1208	Email	Email from paul@terra.money to young@terra.money, with Official Korean to English Translation and Certification	6/4/2019	TFL_SEC_00248418	TFL_SEC_00248419	Hearsay
D-1209	Email	Sentry alert email for LP Server	8/18/2019	TFL_SEC_00248420	TFL_SEC_00248420	None
D-1210	Email	Email from Aaron Myung to Dan Shin	11/5/2019	ZFZ_001867; ECF 125-41	ZFZ_001871; ECF 125-41	Hearsay Relevance 403 undue prejudice
D-1211	Email	Email from jihoonkim to chai-finance/settlement-worker, et al. with Official Korean to English Translation and Certification	12/2/2019	TFL_SEC_00223963	TFL_SEC_00223964	None
D-1212	Email	Email from wool90 to chai-finance/settlement-worker, et al. with Official Korean to English Translation and Certification	12/3/2019	TFL_SEC_00223960	TFL_SEC_00223960	None
D-1213	Email	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1214(A)	Email	Email from Naver Cloud confirming Gaza Labs payment - Korean	12/10/2019	TFL_SEC_00310617	TFL_SEC_00310617	Hearsay
D-1214(B)	Email	Email from Naver Cloud confirming Gaza Labs payment - English translation.	12/10/2019	TFL_SEC_00310617	TFL_SEC_00310617	Hearsay
D-1215	Email	GitHub email with Chai API Code	12/12/2019	TFL_SEC_00223877	TFL_SEC_00223877	None
D-1216	Email	E-mail from D. Kwan to Terra Investor Relations	1/14/2020	TFL_SEC_00223637	TFL_SEC_00223637	None
D-1217	Email	Email from jihoonkim to chai-finance/api-server, et al. with Official Korean to English Translation and Certification	1/31/2020	TFL_SEC_00223720	TFL_SEC_00223722	Hearsay
D-1218	Email	Do Email to Sam Harrison regarding Terra < Blockchain Ventures	2/6/2020	TFL_SEC_00166219	TFL_SEC_00166226	Hearsay
D-1219	Email	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1220	Email	E-mail from CJ Han to President	9/6/2020	SEC-JUMPTRADE-E-0001657	SEC-JUMPTRADE-E-0001658	None
D-1221	Email	Email from CJ Han to jesse@variant.fund, et. al, regarding Settlement Instructions for Mirror	10/5/2020	TFL_SEC_00171264	TFL_SEC_00171264	Hearsay Relevance
D-1222	Email	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1223	Email	Email from CJ Han to Michael Arrington, et al.	10/8/2020	TFL_SEC_00171251	TFL_SEC_00171251	Hearsay Relevance



## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-1224	Email	E-mail from CJ Han to President	1/20/2021	SEC-JUMPTRADE-E-0002701	SEC-JUMPTRADE-E-0002702	None
D-1225	Email	Email from Do Kwon to Justin Lee and others	2/22/2021	TFL_SEC_00253839	TFL_SEC_00253840	Hearsay Relevance
D-1226	Email	E-mail from CJ Han to President	3/13/2021	SEC-JUMPTRADE-E-0001390	SEC-JUMPTRADE-E-0001390	None
D-1227	Email	Email from C. Xiaowei to J. Lin, et al.	3/25/2021	TFL_SEC_00252796	TFL_SEC_00252813	Hearsay Relevance
D-1228	Email	Email from Jeff Kuan to "investment@terra.money" regarding March 2021 Update	3/29/2021	TFL_SEC_00271518; ECF 125-6	TFL_SEC_00271519; ECF 125-6	Hearsay
D-1229	Email	E-mail from CJ Han to President	4/7/2021	SEC-JUMPTRADE-E-0001394	SEC-JUMPTRADE-E-0001394	None
D-1230	Email	Email from CJ Han to Zach Segal (Coinbase)	5/5/2021	TFL_SEC_00158881	TFL_SEC_00158881	Hearsay
D-1231	Email	Intentionally left blank				n/a - exhibit withdrawn
D-1232	Email	Email from donotreply@jumptrading.com to teammillinialerts@jumptrading.com, et al., re coin_transfers ('LUNA') 1621668615: https://cointransfer/ (12 transfers staged)	5/22/2021	JUMP0050768	JUMP0050773	Hearsay
D-1233	Email	Email from donotreply@jumptrading.com to teammillinialerts@jumptrading.com, et al., re coin_transfers ('LUNA') 1621683016: https://cointransfer/ (10 transfers staged)	5/22/2021	JUMP0050815	JUMP0050820	Hearsay
D-1234	Email	Email from OKEx to bitcoin@jumptrading.com re Withdrawal approved	5/22/2021	JUMP0050861	JUMP0050862	Hearsay
D-1235	Email	Email from OKEx to bitcoin@jumptrading.com re Withdrawal approved	5/22/2021	JUMP0051193	JUMP0051194	Hearsay
D-1236	Email	Email from tweekh@jumptrading.com to teammillini@jumptrading.com, et al., re Capital Risk Profile Estimate	5/22/2021	JUMP0050956	JUMP0051023	Hearsay
D-1237	Email	Email from arazumov@jumptrading.com to teammillinialerts@jumptrading.com, et al. re Daily Coin Transfer Requests for 2021-05-23	5/23/2021	JUMP0051645	JUMP0051646	Hearsay
D-1238	Email	Email from tweekh@jumptrading.com to teammillini@jumptrading.com, et al., re Capital Risk Profile Estimate	5/23/2021	JUMP0051502	JUMP0051569	Hearsay
D-1239	Email	Email from Spence Pitts to Kanav Kariya, et al. re Terra liquidity parameters: on-chain / off-chain arb simulation	5/25/2021	JUMP0058037	JUMP0058037	Hearsay
D-1240	Email	Email from Keone Hon to bitcoin/bitcoin re [bitcoin/bitcoin] stacker-alerts: side granularity; send USDUST fills to LUNA; filter ... (#15086)	5/26/2021	JUMP0058510	JUMP0058510	Hearsay
D-1241	Email	Email from Keone Hon to bitcoin/bitcoin re [bitcoin/bitcoin] stacker-alerts: fix bug in external_url definition (#15111)	5/27/2021	JUMP0059044	JUMP0059044	Hearsay
D-1242	Email	Email from Keone Hon to bitcoin/bitcoin re [bitcoin/bitcoin] stacker-alerts: side granularity; send USDUST fills to LUNA; filter ... (#15086)	5/27/2021	JUMP0058752	JUMP0058752	Hearsay
D-1243	Email	Jeff Kuan email to investors re "Terraform Labs Investor Update, May 2021"	6/4/2021	TFL_SEC_00178374	TFL_SEC_00178375	Hearsay
D-1244	Email	Email from jinyeonseol@yanolja.com to woonam.jung@chai.finance, et al., with Official Korean to English Translation and Certification	10/18/2021	TFL_SEC_00244252; ECF 125-30	TFL_SEC_00244253; ECF 125-30	None
D-1245	Email	Email from Arjun Sethy to Boris Revsin re [Confidential] Terra Forex Reserve Raise	11/16/2021	TRIB00001701	TRIB00001715	None
D-1246	Email	Emails between Chai Finance and TFL Finance re: KRT Topups and certified translation	12/13/2021	TFL_SEC_00225533; ECF 125-64	TFL_SEC_00225541; ECF 125-64	Hearsay
D-1247	Email	Email from Ted Maideberg to Functional Leads, et al. re Materials for LPAC mtg on January 11th	1/9/2022	TRIB00002202; Sethi Depo Ex. 19	TRIB00002219; Sethi Depo Ex. 19	Hearsay Foundation
D-1248	Email	Intentionally left blank				n/a - exhibit withdrawn
D-1249	Email	Email from Jason O'Neil to Eric Voigtsberger re Terra Decomp	5/12/2022	TFL_SEC_00352867	TFL_SEC_00352869	Hearsay Relevance
D-1250	Email	Email from Yi Zhang to Aman@galois.capital re [Confidence] Trading > 2022.05.08 UST/LUNA depeg	5/13/2022	TFL_SEC_00349350	TFL_SEC_00349350	Hearsay Relevance
D-1251	Email	Email from Yi Zhang to Varun@galois.capital re [Confidence] Trading > 2022-05-08 LUNA depeg	5/13/2022	TFL_SEC_00351535	TFL_SEC_00351535	Hearsay Relevance
D-1252	Email	Email thread from Stefano Shiavi to Kevin Zhou re Quick Update	5/14/2022	TFL_SEC_00351326	TFL_SEC_00351326	Relevance
D-1253	Email	Proofpoint social Patrol email to various at celsiustnetwork re Policy Violation for Account "CelsiusNetwork"	5/29/2022	TFL_SEC_00248381	TFL_SEC_00248399	Hearsay Relevance
D-1254	Email	Email from Aaron Myung to Elisabeth Goot, et al.	10/13/2022	SEC-HO-14164-E-0000520; A. Myung Depo Ex. 23; ECF 125-46	SEC-HO-14164-E-0000550; A. Myung Depo Ex. 23; ECF 125-46	Hearsay unless used with Myung
D-1255	Email	Email from Roger Landsman to Daren Firestone re SMAIL: HO-14164	12/16/2022	SEC-EMAILS-E-0018782; Hunsaker Depo Ex. 14	SEC-EMAILS-E-0018784; Hunsaker Depo Ex. 14	Hearsay Relevance
D-1256	Email	Email from Aaron Myung to Rahul Abrol	4/4/2023	ZFZ_001994; A. Myung Depo Ex. 30; ECF 125-47	ZFZ_001995; A. Myung Depo Ex. 30; ECF 125-47	Hearsay
D-1257	Email	Email from Aaron Myung to SEC	4/7/2023	SEC-CORR-E-0001124; ECF 125-63	SEC-CORR-E-0001140; ECF 125-63	Hearsay unless used with Myung

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-1258	Email	Email from DocuSign AU System on behalf of Rahul Abrol to Aaron Myung	5/18/2023	ZFZ_0002519; ECF 125-49	ZFZ_0002520; ECF 125-49	Hearsay unless used with Myung
D-1259	Email	Emails from Aaron Myung to Dan Shin and Rahul Abrol	7/4/2023	ZFZ_0002733; ECF 125-37	ZFZ_0002743; ECF 125-37	Hearsay
D-1260	Email	Emails from Aaron Myung to Mark Califano dated August 4, 2023, and August 9, 2023	8/9/2023	ZFZ_000734; A. Myung Depo Ex. 6; ECF 125-50	ZFZ_000739; A. Myung Depo Ex. 6; ECF 125-50	Hearsay
D-1261	Email	Email from Steve Weidenbach to Ailbhe Dempsey re Capital Calls Fund III (with attachment Luna - Understanding the Terra-Ecosystem)	1/25/2022	TRIB00003199; Sethi Dep Ex. 24	TRIB00003202; Sethi Dep Ex. 24	Hearsay Relevance
D-1262	Email	Email from Josh Suter to Chris Drew re End of Year Review	10/4/2021			Hearsay
D-1263	Email	Email dated 5/14/2022 from Kevin Zhou to LPs, with Nabeel Qadri of Protocol Ventures	5/14/2022	TFL_SEC_00351327	TFL_SEC_00351327	Relevance
D-1264	Email	Email dated 5/14/2022 from Kevin Zhou to LPs, with Daniel Sheyner of Chimera Capital Management	5/14/2022	TFL_SEC_00351328	TFL_SEC_00351328	Relevance
D-1265	Email	Notice of a direct message on Twitter from Ren to Kevin Zhou	4/22/2022	TFL_SEC_00351337	TFL_SEC_00351337	Hearsay Relevance Authenticity
D-1266	Email	Notice of a direct message on Twitter from Ren to Kevin Zhou	4/22/2022	TFL_SEC_00351338	TFL_SEC_00351338	Hearsay Relevance Authenticity
D-1267	Email	Notice of a direct message on Twitter from Ren to Kevin Zhou	4/22/2022	TFL_SEC_00351339	TFL_SEC_00351339	Hearsay Relevance Authenticity
D-1268	Email	Notice of a direct message on Twitter from Ren to Kevin Zhou	4/22/2022	TFL_SEC_00351340	TFL_SEC_00351340	Hearsay Relevance Authenticity
D-1269	Email	Message from Stevie at Steele Capital to Kevin Zhou	5/13/2022	TFL_SEC_00351361	TFL_SEC_00351361	Hearsay Relevance Authenticity
D-1270	Email	Email from Yi Zhang describing changes made a page called "2022-05-08 LUNA depeg", sent to aman@galois.capital	5/13/2022	TFL_SEC_00349350	TFL_SEC_00349350	Hearsay Relevance Authenticity Foundation
D-1271	Email	Message from The Giver to Kevin Zhou	4/9/2022	TFL_SEC_00351387	TFL_SEC_00351387	Hearsay Relevance Authenticity
D-1272	Email	Confluence email from Simon Johansen to T. Fugishima	5/14/2021	JUMP0047800	JUMP0047814	Hearsay, Relevance, Authenticity, Foundation
D-1273	Email	Confluence email from Simon Johansen to T. Fugishima	6/16/2021	JUMP0066931	JUMP0066946	Hearsay, Relevance, Authenticity, Foundation
D-1274	Email	Confluence email from Simon Johansen to T. Fugishima	6/22/2021	JUMP0069793	JUMP0069808	Hearsay, Relevance, Authenticity, Foundation
D-1275	Email	Confluence email from Thomas Nagy to T. Fugishima	5/4/2022	JUMP0012152	JUMP0012175	Hearsay, Relevance, Authenticity, Foundation
D-1400	Expert Report	"UST and Terra's Other 'Stable' Coins Are Extremely Susceptible to A Bank Run," Reddit, 2021. <a href="https://www.reddit.com/t/defi/comments/rovuoo/ust-and-terra-s-other-stable-coins-are-extremely/">https://www.reddit.com/t/defi/comments/rovuoo/ust-and-terra-s-other-stable-coins-are-extremely/</a>	2021			Hearsay Relevance Foundation
D-1401	Expert Report	"How to Deposit Crypto to Binance," Binance. <a href="https://www.binance.com/en/support/ga/how-to-deposit-crypto-to-binance-11-5003764971">https://www.binance.com/en/support/ga/how-to-deposit-crypto-to-binance-11-5003764971</a>	4/1/2018			Hearsay Relevance Foundation
D-1402	Expert Report	"Blockchain basics: Introduction To Distributed Ledgers," IBM. <a href="https://developer.ibm.com/tutorials/ci-blockchain-basics-intro-blumix-trs">https://developer.ibm.com/tutorials/ci-blockchain-basics-intro-blumix-trs</a>	6/1/2019			Hearsay Relevance Foundation
D-1403	Expert Report	"How Terra Works," Terra Docs. <a href="https://docs.wdc.me/docs/dev-how-terra-works">https://docs.wdc.me/docs/dev-how-terra-works</a>	11/13/2019			Hearsay Relevance Foundation
D-1404	Expert Report	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1405	Expert Report	"Anchor Protocol: A Savings Protocol Offering Up To 20% APY," Everstake. <a href="https://everstake.medium.com/anchor-protocol-for-beginners-how-to-get-started-5b19f54ced6d">https://everstake.medium.com/anchor-protocol-for-beginners-how-to-get-started-5b19f54ced6d</a>	6/19/2021			Hearsay Foundation
D-1406	Expert Report	"[Proposal] Increasing The Capital Efficiency on Anchor," Anchor Protocol Forum. <a href="https://forum.anchorprotocol.com/t/proposal-increasing-the-capital-efficiency-on-anchor/873">https://forum.anchorprotocol.com/t/proposal-increasing-the-capital-efficiency-on-anchor/873</a>	7/12/2021			Hearsay Foundation
D-1407	Expert Report	"Formation of the Luna Foundation Guard (LFG)," Medium. <a href="https://medium.com/terra-money/formation-of-the-luna-foundation-guard-lfg-6b8dc5e127b">https://medium.com/terra-money/formation-of-the-luna-foundation-guard-lfg-6b8dc5e127b</a>	1/19/2022			Hearsay

Ex.	Type	Description	Document Date	Reg. Bates No.	End. Bates No.	SEC's Objection
D-1408	Expert Report	"Luna Foundation Guard Raises \$1 Billion to Form Bitcoin Reserve for UST Stablecoin," The Block. <a href="https://www.theblock.co/post/134871/luna-foundation-guardtoken-sale">https://www.theblock.co/post/134871/luna-foundation-guardtoken-sale</a>	2/22/2022			Hearsay Relevance Foundation
D-1409	Expert Report	Why Ethereum is switching to proof of stake and how it will work, MIT Technology Review. <a href="https://www.technologyreview.com/2022/03/04/1046636/ethereumblockchain-proof-of-stake/">https://www.technologyreview.com/2022/03/04/1046636/ethereumblockchain-proof-of-stake/</a>	3/4/2022			Hearsay Relevance Foundation
D-1410	Expert Report	"1/ Introducing the 4pool," Do Kwon via X. <a href="https://x.com/stablekwon/status/1510021707377287170?sa=20">https://x.com/stablekwon/status/1510021707377287170?sa=20</a>	4/1/2022			Hearsay Relevance
D-1411	Expert Report	"Anchor Reduces Interest Rate, Could This Be a Theme in 2022?" Vauld Insights. <a href="https://www.vauld.com/insights/anchor-reduces-interest-rate-could-this-be-a-theme-in-2022/">https://www.vauld.com/insights/anchor-reduces-interest-rate-could-this-be-a-theme-in-2022/</a>	5/4/2022			Hearsay Relevance Foundation
D-1412	Expert Report	"Notice of Removal of Trading Pairs and Updates on Tick Size for Spot Trading Pair — 2022-05-13," Binance. <a href="https://www.binance.com/en/support/announcement/notice-of-removal-of-trading-pairs-and-updates-on-tick-size-for-spot-trading-pair-2022-05-13-514e0ba636e843bda47d5d740b7dadf4">https://www.binance.com/en/support/announcement/notice-of-removal-of-trading-pairs-and-updates-on-tick-size-for-spot-trading-pair-2022-05-13-514e0ba636e843bda47d5d740b7dadf4</a>	5/12/2022			Hearsay Relevance
D-1413	Expert Report	Transfer spreadsheet from 8-26-21 to 5-12-22	5/12/2022	JaneStreet00000081	JaneStreet00000081	Hearsay Relevance
D-1414	Expert Report	"Major Exchanges Delist Terra Stablecoin as Price Collapse Continues," The Verge. <a href="https://www.theverge.com/2022/5/13/23070853/crypto-exchanges-delist-terrablockchain-luna-binance">https://www.theverge.com/2022/5/13/23070853/crypto-exchanges-delist-terrablockchain-luna-binance</a>	5/13/2022			Hearsay Relevance
D-1415	Expert Report	Transfer spreadsheet from 3-15-22 to 5-25-22	5/25/2022	TFL_SEC_00270356	TFL_SEC_00270356	Hearsay Relevance
D-1416	Expert Report	"Consensus Mechanisms," Ethereum.org. <a href="https://ethereum.org/en/developers/docs/consensus-mechanisms/">https://ethereum.org/en/developers/docs/consensus-mechanisms/</a>	1/13/2023			Hearsay Foundation Relevance
D-1417	Expert Report	"What Are Automated Market Makers?" Cryptopedia. <a href="https://www.gemini.com/cryptopedia/amm-what-are-automated-market-makers">https://www.gemini.com/cryptopedia/amm-what-are-automated-market-makers</a>	9/22/2023			Hearsay Foundation Relevance
D-1418	Expert Report	Expert Report of Terrence Hendershott, September 28, 2023, Appendix C	9/28/2023			Foundation
D-1419	Expert Report	Expert Report of Terrence Hendershott, September 28, 2023, Appendix D	9/28/2023			Foundation
D-1420	Expert Report	Expert Report of Terrence Hendershott, September 28, 2023, Appendix E	9/28/2023			Foundation
D-1421	Expert Report	Expert Report of Terrence Hendershott, September 28, 2023, Appendix F	9/28/2023			Foundation
D-1422	Expert Report	Expert Report of Terrence Hendershott, September 28, 2023, Appendix G	9/28/2023			Foundation
D-1423	Expert Report	Figures 1 and 2 (with cited source material) extracted from Amended Expert Report of Terrence Hendershott, January 8, 2024	1/8/2024			Hearsay
D-1424	Expert Report	Terra topup transaction history from blockchain (Exhibit 32 to Dr. Edman Rebuttal Report)	3/18/2021 to 3/18/2022			None
D-1425	Expert Report	"Bitcoin Price," CoinMarketCap. <a href="https://coinmarketcap.com/currencies/bitcoin/">https://coinmarketcap.com/currencies/bitcoin/</a>	n.d.			Hearsay Relevance Foundation
D-1426	Expert Report	"Bonded Assets (bAssets)," Anchor Protocol. <a href="https://docs.anchorprotocol.com/anchor-2/protocol/bonded-assets-bassets">https://docs.anchorprotocol.com/anchor-2/protocol/bonded-assets-bassets</a>	n.d.			Hearsay
D-1427	Expert Report	"How Do I Deposit Digital Assets into My KuCoin Account?" KuCoin. <a href="https://www.kucoin.com/support/900007079063">https://www.kucoin.com/support/900007079063</a>	n.d.			Hearsay Relevance Foundation
D-1428	Expert Report	"Liquidation Queue Contract," Anchor Protocol. <a href="https://docs.anchorprotocol.com/anchor-2/smart-contracts/liquidations/liquidation-queue-contract">https://docs.anchorprotocol.com/anchor-2/smart-contracts/liquidations/liquidation-queue-contract</a>	n.d.			Hearsay Relevance Foundation
D-1429	Expert Report	"Loan Liquidation," Anchor Protocol. <a href="https://docs.anchorprotocol.com/anchor-2/protocol/loan-liquidation">https://docs.anchorprotocol.com/anchor-2/protocol/loan-liquidation</a>	n.d.			Hearsay Relevance
D-1430	Expert Report	"Market," Terra Docs. <a href="https://classic-docs.terra.money/docs/develop/modulespecifications/spec-market.html">https://classic-docs.terra.money/docs/develop/modulespecifications/spec-market.html</a>				Hearsay Relevance Foundation
D-1431	Expert Report	"Modify Collateral Attributes," Anchor Protocol. <a href="https://docs.anchorprotocol.com/anchor-2/protocol/anchor-governance/modify-collateralparameters">https://docs.anchorprotocol.com/anchor-2/protocol/anchor-governance/modify-collateralparameters</a>				Hearsay Relevance
D-1432	Expert Report	"Oracle," Terra Docs. <a href="https://classic-docs.terra.money/docs/develop/modulespecifications/spec-oracle.html">https://classic-docs.terra.money/docs/develop/modulespecifications/spec-oracle.html</a>				Hearsay Relevance Foundation
D-1433	Expert Report	"Terra Introduces 4pool for UST, FRAX, USDC and USDt Stablecoins," Bitcoin Insider. <a href="https://www.bitcoininsider.org/article/159351/terra-introduces-4pool-ust-frax-usdc-and-usdstablecoins">https://www.bitcoininsider.org/article/159351/terra-introduces-4pool-ust-frax-usdc-and-usdstablecoins</a>				Hearsay Relevance Foundation

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-1434	Expert Report	"What is Cryptography?" ISO. <a href="https://www.iso.org/information-security/what-is-cryptography">https://www.iso.org/information-security/what-is-cryptography</a>				Hearsay Relevance Foundation
D-1435	Expert Report	Jump Trade Data produced by Katten to the SEC on September 2, 2022		SEC-JUMPTRADE-E-0022379	SEC-JUMPTRADE-E-0022414	None
D-1436	Expert Report	Accompanying Underlying Materials to Expert Report of Terrence Hendershott, September 28, 2023				Hearsay Foundation Authenticity
D-1437	Expert Report	LP Server Transaction & Message Counts.xlsx				None
D-1438	Expert Report	SEC-GITHUB-E-0000300_collect-merchant-wallets.ts.txt				None
D-1439	Expert Report	SEC-GITHUB-E-0000300_collect-user-wallets.ts.txt				None
D-1440	Expert Report	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1441	Expert Report	Expert Report of Terrence Hendershott, September 28, 2023, Figures 1-35 (with cited source material)	9/28/2023			Hearsay
D-1500	Media	A Short History of PayPal's Microservices Architecture: Matt Cole, PayPal, presentation given in 2019 by Matt Cole, a Senior Integration Engineer at PayPal, <a href="https://www.youtube.com/watch?t=758&amp;v=KwTxhG4QMI&amp;feature=youtu.be">https://www.youtube.com/watch?t=758&amp;v=KwTxhG4QMI&amp;feature=youtu.be</a>	2019			Hearsay Relevance Foundation
D-1501	Media	Wayback capture of Mirror.finance website	7/2/2021			Relevance
D-1502	Media	Cjango Unchained Interview. <a href="https://www.youtube.com/watch?v=RrmfpdSTE&amp;t=252s">https://www.youtube.com/watch?v=RrmfpdSTE&amp;t=252s</a>	10/28/2021			Hearsay
D-1503	Media	Deiphi Digital Live Stream with Do and Jose Macedo. <a href="https://www.youtube.com/watch?v=WEWCigLmZfA">https://www.youtube.com/watch?v=WEWCigLmZfA</a>  <a href="https://twitter.com/broadcasts/1BdGYwpzpJXxX">https://twitter.com/broadcasts/1BdGYwpzpJXxX</a>	11/9/2021			Hearsay
D-1504	Media	Transcript of an episode of podcast The Ship Show	3/1/2022			None
D-1505	Media	Do Kwon Interview, "Money Talks." <a href="https://www.youtube.com/watch?v=3e5nvQKV7d4">https://www.youtube.com/watch?v=3e5nvQKV7d4</a>	4/1/2022			Hearsay
D-1506	Media	Interview - Galaxy Digital's Novogratz on "Crypto Winter" <a href="https://www.youtube.com/watch?v=JvPZ6o0ai7E">https://www.youtube.com/watch?v=JvPZ6o0ai7E</a>	7/19/2022			Hearsay Relevance Foundation
D-1507	Media	Myung Dec Ex 16b - Audio transcription	8/7/2023			Hearsay unless used with Myung
D-1508	Media	LFG - Luna Foundation Guard. <a href="https://lfg.org/missionandvision/#:~:text=The%20Luna%20Foundation%20Guard%20(%E2%80%9CLFG,promote%20a%20truly%20decentralized%20economy">https://lfg.org/missionandvision/#:~:text=The%20Luna%20Foundation%20Guard%20(%E2%80%9CLFG,promote%20a%20truly%20decentralized%20economy</a>	n.d.			Hearsay Relevance
D-1509	Media	Ex. 269A (Screenshot of the video taken of a conversation between Do Kwon and Kanav Kariya)				None
D-1510	Media	Ex. 269B (Video taken of a conversation between Do Kwon and Kanav Kariya).				None
D-1511	Media	Myung Dec 18a - Media		SEC-HO-14164-E-0002430	SEC-HO-14164-E-0002430	Hearsay unless used with Myung
D-1512	Media	Myung Dec 18b - Audio transcription				Hearsay unless used with Myung
D-1513	Media	Myung Dec Ex 16a - Media		SEC-HO-14164-E-0002438	SEC-HO-14164-E-0002438	Hearsay unless used with Myung
D-1514	Media	YouTube video published by Terra, "How Does Terra Work?" (Oct 21, 2020), <a href="https://www.youtube.com/watch?v=KqPGMoYZMhY">https://www.youtube.com/watch?v=KqPGMoYZMhY</a>	10/21/2020			Hearsay
D-1600(A)	Text/Chat	12/11/2019 dev-core Slack conversation with Paul Kim, DH Yu, Yun Yeo, Do Kwon, et al. (Original Korean)	12/11/2019	TFL_SEC_00237912	TFL_SEC_00237915	None
D-1600(B)	Text/Chat	12/11/2019 dev-core Slack conversation with Paul Kim, DH Yu, Yun Yeo, Do Kwon, et al. (English Translation)	12/11/2019	TFL_SEC_00237912	TFL_SEC_00237915	None
D-1601	Text/Chat	Telegram chat record between President and D. Kwon	12/11/2019			Hearsay
D-1602	Text/Chat	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1603	Text/Chat	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1604	Text/Chat	Public chatroom	1/28/2021	TFL_0008252	TFL_0008321	Hearsay Relevance
D-1605	Text/Chat	Chat	4/13/2021	TFL_0007429	TFL_0007511	Hearsay Relevance
D-1606	Text/Chat	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1607	Text/Chat	Internal Team Leadership Slack Chat	5/23/2021	TFL_SEC_00240195	TFL_SEC_00240196	Hearsay
D-1608	Text/Chat	Telegram thread, "Anchor Protocol"	5/23/2021			Hearsay Relevance Foundation

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-1609	Text/Chat	Telegram thread, "Terra Network"	5/23/2021			Hearsay Relevance Foundation
D-1610	Text/Chat	Public chatroom discussing TFL using liquidity	5/24/2021			Hearsay Relevance Foundation
D-1611	Text/Chat	Robert Frank on "Terra Network" telegram	5/26/2021	TFL_0008567	TFL_0008672	Hearsay Relevance Foundation
D-1612	Text/Chat	Slack messages between Aaron Myung and Bring Jung	1/20/2022			None
D-1613	Text/Chat	Wintermute EG Luna UST Conversations Slack	2/22/2022			Hearsay Relevance
D-1614	Text/Chat	Wintermute EG Luna UST Conversations Slack, redacted	2/22/2022			Hearsay Relevance
D-1615(A)	Text/Chat	Instant messages from Aaron Myung to Eugene Chang - Korean	5/11/2022			Hearsay
D-1615(B)	Text/Chat	Instant messages from Aaron Myung to Eugene Chang - English	5/11/2022			Hearsay
D-1616	Text/Chat	Wintermute EG Luna UST Conversations Telegram, May 10-12, 2022	5/12/2022			Hearsay Relevance
D-1617	Text/Chat	Wintermute EG Luna UST Conversations Telegram, redacted, May 10-12, 2022	5/12/2022			Hearsay Relevance
D-1618	Text/Chat	Text message from Aaron Myung to Dan Shin	6/12/2022			Hearsay
D-1619	Text/Chat	Instant messages between Aaron Myung and Rahul Abrol from June 14, 2022, to June 15, 2023	6/15/2023			Hearsay
D-1620	Text/Chat	Terra Santa - Motivation Github Screenshot	n.d.			Hearsay Relevance Foundation
D-1621	Text/Chat	Chat Thread, May 2022 through May 2023		TFL_SEC_00349207	TFL_SEC_00349255	Hearsay unless used with Hunsaker
D-1622	Text/Chat	Comment from User Sihyeok (Stanford Liu) on Terra General Discord Channel at TFL_0009448		TFL_0009448	TFL_0009448	Hearsay
D-1623	Text/Chat	Farewell to Terra Santa Github Screenshot				Hearsay Relevance Authenticity Foundation
D-1624	Text/Chat	Fatman messages with nostablekwon, May 2022-May 2023		LFM-000001 TFL_SEC_00349207	LFM-000074 TFL_SEC_00349280	Hearsay unless used with Hunsaker
D-1625	Text/Chat	Terra Santa Commit Github Screenshot				Hearsay Relevance Authenticity Foundation
D-1626	Text/Chat	Terra-Money Github Moved Notice Screenshot				Hearsay Relevance Authenticity Foundation
D-1627	Text/Chat	Kakao chat between Do Kwon and Aaron Myung, between 1-18-21 and 3-21-22		ZFZ_0003381; Myung Decl. Ex. 14	ZFZ_0003381; Myung Decl. Ex. 14	None
D-1628	Text/Chat	Exhibit 6 from Deposition of Marina Gurevich Wintermute CFO Public announcement of Forbes article				Hearsay Relevance
D-1629	Text/Chat	Message from Kevin Zhou one-third down	9/27/2023	TFL_SEC_00353812	TFL_SEC_00353834	Hearsay Authenticity Relevance
D-1630	Text/Chat	Message from Kevin Zhou at top	9/27/2023	TFL_SEC_00353864	TFL_SEC_00353888	Hearsay Authenticity Relevance
D-1700	Tweets	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1701	Tweets	Twitter Contest Tweet thread between Do Kwon and Twitter User	2/9/2020			No objection
D-1702	Tweets	Tweet from @stablekwon	2/4/2021			Hearsay Relevance
D-1703	Tweets	TFL tweet	5/23/2021	TFL_SEC_00345777	TFL_SEC_00345780	Hearsay
D-1704	Tweets	TFL's post-mortem tweet on depeg	5/24/2021			None
D-1705	Tweets	Economist Frances Coppola tweets: "Self-correction mechanisms that rely on financial incentives do not work when panicking humans are stampeding for the exit." <a href="https://twitter.com/Frances_Coppola/status/1410485529607643136">https://twitter.com/Frances_Coppola/status/1410485529607643136</a>	7/1/2021			Hearsay Relevance Foundation
D-1706	Tweets	Do Kwon tweet	11/20/2021			Hearsay
D-1707	Tweets	Twitter user @FreddieRaynolds tweets thread with detailed breakdown of viability of potential Soros style attack on LUNA and UST.	11/25/2021			Hearsay Relevance Foundation



Ex.	Type	Description	Document Date	Beg. Bates No.	End. Bates No.	SEC's Objection
D-1708	Tweets	An engineer at MakerDAO, Sam McPherson (handle @hexonaut) tweeted, arguing that "UST will collapse in a death spiral with LUNA hyper-inflating to try to cover the peg". <a href="https://twitter.com/hexonaut/status/1476649894479753238?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg;%20https://twitter.com/RuneKek/status/1478166276979793922?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg">https://twitter.com/hexonaut/status/1476649894479753238?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg;%20https://twitter.com/RuneKek/status/1478166276979793922?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg</a>	12/30/2021			Hearsay Relevance Foundation
D-1709	Tweets	Twitter posts by MakerDAO co-founder. <a href="https://twitter.com/hexonaut/status/1476649894479753238?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg;%20https://twitter.com/RuneKek/status/1478166276979793922?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg">https://twitter.com/hexonaut/status/1476649894479753238?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg;%20https://twitter.com/RuneKek/status/1478166276979793922?s=20&amp;t=2n6lPnOxhpcLu7CoEn%20DtOg</a>	12/30/2021			Hearsay Relevance Foundation
D-1710	Tweets	Announcement of formation of Luna Foundation Guard. <a href="https://twitter.com/terra_money/status/1483962815543013376">https://twitter.com/terra_money/status/1483962815543013376</a>	1/19/2022			Hearsay
D-1711	Tweets	Public announcement of fundraising by LFG. <a href="https://twitter.com/terra_money/status/1496162889085902856">https://twitter.com/terra_money/status/1496162889085902856</a>	2/22/2022			Objection withdrawn
D-1712	Tweets	Additional public donation of LUNA by Terraform to LFG. <a href="https://twitter.com/stablekwon/status/1502225674840555523">https://twitter.com/stablekwon/status/1502225674840555523</a>	3/11/2022			Hearsay
D-1713	Tweets	Do Kwon tweet	3/11/2022			Hearsay
D-1714	Tweets	<i>Intentionally left blank</i>				n/a - exhibit withdrawn
D-1715	Tweets	LFG continued to publicly acquire Bitcoin as a reserve. <a href="https://twitter.com/LFG_org/status/1522234947070689280?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1522234947070689280%7Ctwgr%5Ebcfe205448325ad37672e6afcf766c4612f5tf52%7Ctwtcon%5Es1_ref_url=https%3A%2F%2Fcoingecko.com%2Fnews%2Fterra-foundation-guard-purchases-additional-37-863-btc-as-part-of-reserve-strategy">https://twitter.com/LFG_org/status/1522234947070689280?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwtterm%5E1522234947070689280%7Ctwgr%5Ebcfe205448325ad37672e6afcf766c4612f5tf52%7Ctwtcon%5Es1_ref_url=https%3A%2F%2Fcoingecko.com%2Fnews%2Fterra-foundation-guard-purchases-additional-37-863-btc-as-part-of-reserve-strategy</a>	5/5/2022			Hearsay
D-1716	Tweets	LFG announcement. <a href="https://twitter.com/LFG_org/status/1523512196965167104">https://twitter.com/LFG_org/status/1523512196965167104</a>	5/8/2022			Hearsay
D-1717	Tweets	During the May 2022 depeg, Kwon and LFG kept the public up to date on maintaining the peg. <a href="https://twitter.com/stablekwon/status/1523532476898897920">https://twitter.com/stablekwon/status/1523532476898897920</a>	5/9/2022			Hearsay
D-1718	Tweets	Gadikian Post on X	5/10/2022			Hearsay Relevance
D-1719	Tweets	During the May 2022 depeg, Kwon and LFG kept the public up to date on maintaining the peg. <a href="https://twitter.com/LFG_org/status/1523512196965167104">https://twitter.com/LFG_org/status/1523512196965167104</a>	5/11/2022			Hearsay
D-1720	Tweets	Terra Money Twitter thread, May 12-16, 2022	5/16/2022			Hearsay
D-1721	Tweets	6/11/22, Do's Nominal Cash Salary. <a href="https://twitter.com/stablekwon/status/1535811519182606336">https://twitter.com/stablekwon/status/1535811519182606336</a>	6/11/2022			Hearsay
D-1722	Tweets	Draft of Terraform Labs tweets concerning May 2022 Depeg	n.d.	TFL_SEC_00169657	TFL_SEC_00169657	Hearsay Relevance
D-1723	Text/Chat	August 10 Text Messages with William Christopher David Chen	8/10/2024	TFL_EMP_00030455		Hearsay Relevance 403 prejudice
D-1724	Text/Chat	8/11/2021 Slack conversation between Do Kwon and SJ Park	8/11/2021	TFL_EMP_00030452	TFL_EMP_00030454	Hearsay Relevance 403 prejudice
D-1725	Text/Chat	7/15/2021 Slack conversation between Do Kwon and SJ Park	7/15/2021	TFL_EMP_00037886	TFL_EMP_00037887	Hearsay Relevance 403 prejudice
D-1726	Text/Chat	7/14/2021 Slack conversation between Do Kwon and SJ Park	7/14/2021	TFL_EMP_00006726	TFL_EMP_00006728	Hearsay Relevance 403 prejudice
D-1727	Text/Chat	8/8/2021 Slack conversation between Do Kwon and SJ Park	8/8/2021	TFL_EMP_00015510	TFL_EMP_00015511	Hearsay Relevance 403 prejudice
D-1728	Text/Chat	Text messages between William Chen and Michael Brown	n.d.	TFL_EMP_00015512		Hearsay Relevance 403 prejudice
D-1729	Tweets	Twitter thread posted on May 25, 2021, by @terra_money	5/25/2021			Hearsay
D-1730	Tweets	Exhibit 7 from Deposition of Marina Gurevich - Winternute Twitter announcement of Forbes article	12/20/2022			Hearsay Relevance
D-1731	Tweets	Twitter DMs from Ashour Iesho to Zhou	5/7/2022	TFL_SEC_00350967	TFL_SEC_00350967	Hearsay Authenticity Relevance

## Defendants' Exhibit List with SEC's Objections

Ex.	Type	Description	Document Date	Seg. Bates No.	End. Bates No.	SEC's Objection
D-1732	Tweets	Twitter DMs from Ashour Iesho to Zhou	5/7/2022	TFL_SEC_00350968	TFL_SEC_00350968	Hearsay Authenticity Relevance
D-1733	Tweets	Twitter DMs from Ashour Iesho to Zhou	5/7/2022	TFL_SEC_00350970	TFL_SEC_00350970	Hearsay Authenticity Relevance
D-1734	Tweets	Twitter DM from Jack Liu to Kevin Zhou	5/6/2022	TFL_SEC_00351075	TFL_SEC_00351075	Hearsay Authenticity Relevance
D-1735	Tweets	Galois Capital Tweets	3/6/2022			Hearsay Relevance
D-1736	Tweets	Galois Capital Tweets	3/6/2022			Hearsay Relevance
D-1737	Tweets	Galois Capital Tweets	3/15/2022			Hearsay Relevance
D-1738	Tweets	Galois Capital Tweets	3/15/2022			Hearsay Relevance
D-1739	Tweets	Galois Capital Tweets	4/5/2022			Hearsay Relevance
D-1740	Tweets	Galois Capital Tweets	5/6/2022			Hearsay Relevance
D-1741	Tweets	Galois Capital Tweets	5/7/2022			Hearsay Relevance
D-1742	Text/Chat	Conversation between Paul Kim and Etienne Napoleone	10/9/2020			None
D-1743(A)	Text/Chat	Conversation between Paul Kim and Yun Yeo (Original Korean)	4/21/2020			None
D-1743(B)	Text/Chat	Conversation between Paul Kim and Yun Yeo (Certified English Translation)	4/21/2020			None
D-1744	Text/Chat	Conversation between Paul Kim and Nicolas Andreoulis	9/22/2020			None
D-1745	Text/Chat	Conversation between Paul Kim and Michael Brown	2/28/2022			None